

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ROBERT DAVID STEELE,

Plaintiff,

-against-

JASON GOODMAN,

Defendant.

17-CV-00601-MHL

**ANSWER TO PLAINTIFF STEELE'S
MEMORANDUM OF OPPOSITION
BY INTERVENOR-APPLICANT**

**ANSWER TO DEFENDANT STEELE'S RESPONSE IN OPPOSITION BY
INTERVENOR-APPLICANT**

1. **TO ALL PARTIES**, the non-attorney intervenor-applicant now serves this ANSWER IN OPPOSITION as a response to **ECF Doc. No. 107** [05/01/19]; Plaintiff's Memorandum of Opposition. The Clerk should note that this response conforms to **ECF No. 97** [04/18/2019]; Court's ORDER.

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 15 day of May 2019.

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PROCEDURAL HISTORY

1. Via ECF Doc. No. 39 [04/13/18] Plaintiff filed an Amended Complaint.
2. Between May and June, 2018 the Movant filed seven (7) declarations with this Court (ECF.Nos 51, 54, 55, 56, 58, 59 & 60).
3. Via ECF Doc. No. 66 [9/6/18] the Court posted an ENTRY OF DEFAULT stating that “the defendant, Susan A. Lutzke, has failed to appear..”.
4. Via ECF Doc. No. 81 [3/18/19] the Movant advised the Court and Jason Goodman (Defendant) that: “4. Presently, all the attached exhibits attached to document number 78 are lacking authentication by written oath given under perjury that such exhibits and affidavits are accurate.” The communication also addressed Federal Rules of Evidence (Fed. R. Evid.) Rules 401, 402, 901(A), 902(11) and 902(12). The document cites *Lorraine v. Markel American Ins. Co.*, 241 F.R.D. 534 and *United States v. Hassan*, 742 F.3d 104.
5. Movant’s (ECF Doc. No. 93 [4/11/2019]) AMENDED MOTION to Intervene by D. George Sweigert. (Attachments: # 1 Exhibit Cover Sheet, # 2 Exhibit 1A, # 3 Exhibit 1B, # 4 Exhibit 1C, # 5 Exhibit 1D, # 6 Exhibit 2, # 7 Exhibit 3, # 8 Exhibit 4, # 9 Exhibit 5, # 10 Exhibit 6A, # 11 Exhibit 6B, # 12 Exhibit 6C, # 13 Exhibit 6D, # 14 Exhibit 7, # 15 Exhibit 8, # 16 Local Rule 83.1)
6. By ORDER (ECF Doc. 105) the Movant-undersigned is responding to the Response In Opposition by Jason Goodman (ECF Doc. 104). Goodman files his Response to undersigned’s motion (ECF Doc. No. 93). Quoting ECF docket entry (in relevant part):

ORDER - Sweigert SHALL file a reply to Goodman's response to the Amended Motion to Intervene by May 22, 2019. Additionally, also by May 22, 2019,

Sweigert SHALL file a reply to each party's response to the Amended Motion to Intervene. SEE ORDER FOR DETAILS. Signed by District Judge M. Hannah Lauck on 05/01/2019.

7. The undersigned filed a REPLY (ECF Doc. No 110) to Def Goodman's OPPOSITION (ECF Doc. No. 106). ECF Doc. No. 110 contained Exhibit Three which the alleged plan of the Def Goodman to have the undersigned seriously hurt or killed.

8. The undersigned filed a REPLY (ECF Doc. No 111 [05/13/2019]) to Def Patricia A. Negron's OPPOSITION (ECF Doc. No. 104 [4/30/2019]).

9. The above documents are cited and incorporated herein as if fully restated herein.

INTRODUCTION AND SUMMARY OF ARGUMENT

10. The Movant now comes to **REPLY** to the Plaintiff's Memorandum of Opposition (Do. No. 107 [05/01/2019]) pursuant to the legal tests as articulated in Fed. R. Civ. Proc. Rule 24(a)(2) and the Fourth Circuit.

11. The First Amendment's Petition Clause guarantees the Movant's right to have access to the federal courts should not be abridged for the reasons stated in the Plaintiff's Memorandum [ECF No. 107].

12. Both Def Goodman and the undersigned are prohibited (by a federal judge's order) from submitting any motions or requests for relief to the Southern District of New York (S.D.N.Y.). The Movant presently has no access to seek relief from Def Goodman's wholesale destruction of Movant's career and business; property rights established in prior pleadings. While the S.D.N.Y. court is working through a backlog of thousands of lawsuits and motions (in some instances litigant's wait for decisions which have been delayed up to two years) Def Goodman has exploited this situation to increase his smear campaigns.

13. Meanwhile the Plaintiff and his attorney openly support wacky social media conspiracy podcasts (see DEFANGO and UNIROCK) and contend the undersigned should not be forced to patiently wait several more months (or years) for a S.D.N.Y. decision while the Def Goodman continues his open-ended and continuous slander and defamation *per se* campaign.

14. In lieu of complete status as an intervenor-plaintiff, and in the interests of judicial efficiency, the Movant is willing to be granted the status of **limited intervenor-plaintiff** for the limited purposes of pursuing injunctive relief against the Defendant (Def) Goodman and his co-conspirators.

BACKGROUND

CASE 1:18-CV-08653-VEC

S.D.N.Y. (SWEIGERT VS. GOODMAN)

15. Contrary to the Plaintiff's assertions, the undersigned has no legal alternatives available to him in the U.S. court system to seek redress from the Def Goodman's well documented smear campaigns. "[F]alse statements are not immunized by the First Amendment right to freedom of speech." *Bill Johnson's Restaurants, Inc. v. NLRB*, 461 U.S. 731, 743 (1983).

16. In the case known as *Sweigert vs. Goodman*, Case 1:18-cv-08653-VEC, S.D.N.Y all activity has been stayed by court order. There have been **no** docket entries since 1/23/2019 in that case. The S.D.N.Y. District Judge (Judge Valerie E. Caproni) has forbidden any future motions or motion like filings until she issues a decision in the case (see ORDER TO SHOW CAUSE, ECF Doc. No. 65, 11/16/2018). Quoting in relevant part:

"IT IS HEREBY ORDERED that all pending motions and deadlines are STAYED pending resolution of this Order to Show Cause. Furthermore, until further order from

this Court, **neither party is permitted to file any further motions or pleadings** except in response to this Order to Show Cause.” [emphasis **not** added]

[EXHIBIT ONE]

17. The Movant and Def Goodman have been enjoined by the S.D.N.Y. court and are **not** permitted access to that court (pending a ruling on the Order to Show Cause). It is instructive to note that Def Goodman began the latest stage in smear campaigning against the Movant (with David Charles Hawkins of South Surrey, British Columbia, Canada) on or about 01/01/2019 with knowledge that the Movant was cut off from access to the S.D.N.Y. The smear campaign continues to this day in an open-ended fashion (two podcasts per week on twelve (12) social media platforms. A small representative example of these smears, falsehoods, direct misrepresentations, etc. is contained in **EXHIBIT TWO**.

18. The Court should note that it has been widely reported that jurists in the S.D.N.Y. are struggling with a terrific backlog of cases and motions **[EXHIBIT THREE]**; *Judge's Decisions Are Conspicuously Late*, New York Times (internet URL: <https://www.nytimes.com/2004/12/06/nyregion/judges-decisions-are-conspicuously-late.html>).

Quoted in relevant part:

They are kept in federal courthouses across the United States, although, understandably, they are not prominently displayed: lists of cases that have dragged on for months or even years, often because a judge has failed to make a key ruling.

But there is one unchallenged king of delayed decisions: Judge George B. Daniels of Federal District Court in Manhattan, who, the latest statistics show, had 289 motions in

civil cases pending for more than six months, by far the highest total of any federal judge in the nation.

19. The publication “*Statistics, Southern District of New York*”, Second Circuit Court of Appeals, [EXHIBIT FOUR] reports that each individual judgeship in the S.D.N.Y. handles (on average) 356 to 381 civil cases. A total of 15,825 to 16,852 civil cases were pending (years 2005 to 2006) at one time in that court.

20. Indeed, as reported by the Office of the Administration of the U.S. Courts in 2018, 15,104 filings occurred in the S.D.N.Y. 19,239 cases were pending. (Internet URL:

https://www.uscourts.gov/sites/default/files/fcms_na_distprofile1231.2018.pdf) [EXHIBIT FOUR]. See *U.S. District Courts—Combined Civil and Criminal Federal Court Management Statistics* (December 31, 2018), Administrative Office of the U.S. Courts (Internet URL: <https://www.uscourts.gov/>).

21. As reported by Wikipedia six (6) S.D.N.Y. judgeships are presently vacant (Internet URL: https://en.wikipedia.org/wiki/United_States_District_Court_for_the_Southern_District_of_New_York) [EXHIBIT FOUR].

22. The Court is reminded that the Movant never selected the S.D.N.Y. as a forum – it was selected for him by the presiding judge in Charleston, South Carolina who transferred the original lawsuit against Goodman. See [EXHIBIT FIVE]

LINKAGE OF INTERVENOR-
APPLICANT WITH PARTIES

23. On June 13, 2017 (a day before the Port of Charleston dirty bomb hoax) Plaintiff [RDS – Robert David Steele] was anxious to have the undersigned’s brother (“George Webb”) join the Plaintiff’s UNRIG campaign for the purposes of raising money via a cross country tour in a recreational vehicle (RV). George Webb (Sweigert) displays a certain social media charisma that induces people to donate money to causes (see \$38,000 raised for former F.B.I. agent Robyn Gritz for “*legal expenses*” via GoFundMe.com).

24. On 6/15/2017 Plaintiff [RDS] published a blog entitled, “Robert Steele with George Webb: #UNRIG UPDATE 2: Continue to Support George Webb – the Facts of the Matter” (Internet URL: <https://phibetaiota.net/2017/06/robert-steele-with-george-webb-unrig/>).

[EXHIBIT SIX]. RDS made it very clear in several blog posts that he appreciated “George Webb” (undersigned’s brother); “My door is always open for George. I consider George an unwitting (innocent) patsy in this dirty bomb matter.” [EXHIBIT SIX]. Caveat: Mr. George Webb Sweigert is mentioned on page 28, ECF Doc. No. 39 [Amended Complaint].

25. On page 64 of ECF Doc. No. 39 [Amended Complaint] the Movant is pictured in a straight-jacket and dunce cap in the podcast “*Deep State Dunces Attack George Webb and CSTT – Bitcoin Challenge Response*,” 11/27/2017. (Internet URL: <https://www.youtube.com/watch?v=GNxCk6nqFJg>) [EXHIBIT SEVEN] The focus of the video is the display of a tri-partite conspiracy of the undersigned, the Plaintiff and Manuel Chavez, III (who Plaintiff’s attorney assisted with legal advice and apparent arrangement to appear on “Manny’s” YouTube show). See footnote 14:

“14 The other persons depicted in the picture are Manuel Chavez (the pig) and Dave Acton (in the straight-jacket). Dave Acton a/k/a David Sweigert is the brother of George Webb. [<https://steemit.com/youtube/@reallygraceful/navigating-the-tangled-webb-or-part->

one-george-webb-and-dave-acton-reveal-they-re-brothers]. “George Webb” is an individual who appears with Goodman and Negron in several of the videos at issue in this action. [sic] ECF Doc. No. 65. “ **[EXHIBIT EIGHT]** [emphasis added]

26. Manual Chavez, III aka “DEFANGO” received a draft electronic file of a defamation complaint, to be printed and filed in the Arizona state courts by DEFANGO (as instructed by the Plaintiff’s counsel). The ghost-writing author for this DEFANGO Arizona complaint was the attorney for Plaintiff-RDS. **[EXHIBIT ELEVEN]**

27. Additionally, the Plaintiff-RDS appeared in person twice on a DEFANGO YouTube show to discuss issues including areas of this lawsuit. **[EXHIBIT NINE]**

28. In a bizarre twist, DEFANGO did not file the documents with the Arizona court. Instead DEFANGO (Chavez) calls the Plaintiff’s counsel (Mr. Biss, esq.) and discusses the situation on a YouTube livestream. The discussion between DEFANFO and Mr. Biss, esq. also included a fellow YouTube channel named “UNIROCK”. When Biss answers the phone, Manual Chavez III identifies himself as “**This is Manual Chavez**”. Biss replied “**Hi, Manny**”. **[EXHIBIT TEN]**

29. To amplify, “DEFANGO” conducted a YouTube podcast in which he displays the draft complaint written for him by the Plaintiff’s counsel, which appears to be designed as a *pro se* complaint. **[EXHIBIT ELEVEN]**. The signature blocks and law office address of Plaintiff’s counsel can be seen in the e-mail message to “DEFANGO” (Chavez). **[EXHIBIT ELEVEN]**.

30. Such activities are referred to by Movant as behind the scenes “monkey business”.

LAW AND ARGUMENT

31. The following law and argument demonstrate that the Movant (undersigned) has met the legal tests for intervention in this litigation (at the very least status as a limited intervenor for the purposes of obtaining injunctive relief from this Court).

TO DENY INTERVENTION IS A
VIOLATION OF THE PETITION CLAUSE

32. Restricting Movant's access to this Court speaks to foundational issues of the Petition Clause of AMENDMENT I; quoting in relevant part:

“Congress shall make no law ... abridging .. the right of the people .. to petition the Government for a redress of grievance.” [U.S. Const. amend I]

33. Many courts have recognized that the Petition Clause grants an absolute right to access the courts. For example, the Rhode Island Supreme Court held that the Petition Clause protected both petitioning at “the town-council level” and “access to court” and thus limited application of state common tort law torts of abuse of process and interference with contractual relations. See *Cove Rd. Dev. V. Western Cranston Indus. Park. Assocs.*, 674 A.2d 1234, 1237-38 (R.I. 1996). *NAACP v. Button*, 371 U.S. 415, 433 (1963) (noting that First Amendment freedoms, including right to petition, are “delicate and vulnerable, as well as supremely precious in our society” and demand protection).

34. The Supreme Court has reaffirmed the rights of individual petitioners to seek redress in the federal courts. In *Sure-Tan v. NLRB*, 467 U.S. 883 (1984) the Court, in dictum, stated that “[t]he First Amendment right protected in *Bill Johnson's Restaurants* is plainly a ‘right of access to the courts ... for alleged wrongs’”. *Id.* At 897. In *McDonald v. Smith*, 472 U.S. 479 (1985) the Court broadly stated, also in dictum, that the Petition Clause protects civil court filings: “[F]iling

a compliant in court is a form of petitioning activity.” *Id.* At 484. See *Bill Johnson's Restaurants, Inc. v. National Labor Relations Board*, 461 U.S. 731 (1983).

35. The Supreme Court has repeatedly recognized that access to the courts is a fundamental liberty within the meaning of the Privileges and Immunities Clause. See *Blake v. Coryell*, 6 F. Case 546, 551-52 (E.D. Pa. 1823). “*The right to petition the courts cannot be so handicapped*”. See *NAACP v. Button*, 371 U.S. 415 (1963) at 7 [emphasis added].

36. “[T]he right of access to federal courts is not a free-floating right, but rather is subject to Congress’s Article III power to set limits on federal legislation.” In *Roller v. Gunn*, 107 F.3d 227, 231 (4th Cir.), cert. denied, 118 S. Ct. 192 (1997). In *Roller* the Fourth Circuit rejected a prisoner’s contention that the filing fee and cost provisions of the Prison Litigation Reform Act (28 U.S.C. § 1915(b)(1), (b)(2) and (b)(4)) violated “his constitutional right of access to the courts,” finding them to be only “mild” barriers to the courthouse. 107 F.3d at 231, 233. In *Church v. Attorney Gen. of Va.*, 125 F.3d 210, 212 (4th Cir. 1997)

37. The Second Circuit has summarized these rights of petition in *Monsky v. Moraghan*, 127 F.3d 243, 246 (2d Cir. 1997) (“It is well established that all persons enjoy a constitutional right of access to the courts, although the source of this right has been variously located in the First Amendment right to petition for redress, the Privileges and Immunities Clause ... and the Due Process Clauses ...”).

38. Indeed, many scholars have addressed the Petition Clause and the absolute right of a movant to seek redress in the federal court. See Norman B. Smith, “*Shall Make No Law Abridging ... An Analysis of the Neglected, But Nearly Absolute, Right of Petition*”, 54 U. Cin. L. Rev. 1153, 1154-70 (1986) and Benjamin Plener Cover, “*The First Amendment Right to a*

Remedy”, U. California – Davis [Vol. 50:1741]. (Internet URL:

https://law.yale.edu/system/files/area/center/liman/document/50-4_cover.pdf)

THIS LITIGATION WAS APPARENTLY
BROUGHT FOR AN IMPROPER PURPOSE

39. The time has come for this Court to undertake serious action to mitigate the damage inflicted on the Court’s reputation by the bizarre cast of characters associated with case. The Court will recall that Plaintiff RDS stated in electronic messages to “George Webb” (Sweigert) that this present litigation was more or less a spare tire to back-up the wacky YouTube celebrity “DEFANGO” (Chavez), who was acting as the litigation *tip of the spear* (Plaintiff’s words “Manny is the one who will be in front”). **[EXHIBIT FIFTEEN]**

40. The (1) troubling statement (“Manny is the one who will be in front”) and the (2) legal documents prepared by the Plaintiff’s attorney (Mr. Biss, esq.) and e-mailed to DEFANGO for filing in the State of Arizona courts, create doubt as to the sincerity driving this present litigation.

41. Then DEFANGO backs out of the scheme (doesn’t file the Biss complaint), leaving the Plaintiff high and dry with this instant lawsuit. To muddy the reputation of the legal profession, DEFANGO broadcasts telephone calls to the Plaintiff’s attorney on YouTube podcasts to discuss another wacky YouTube celebrity “UNIROCK”. Unfortunately, the integral inclusion of DEFANGO in this litigation supports the theory that this instant lawsuit was nothing more than a fluff piece to garner social media headlines, increase view counts and garner more subscribers for DEFANGO (improper purpose).

42. Attorney Biss has an alleged reputation for filing other fluff piece lawsuits (publicity stunts) that are not expected to mature past the pleading stage, but to remain stillborn after the headlines and social media excitement begins to diminish. This is amplified by the filing of a

lawsuit in the Commonwealth of Virginia courts by Mr. Biss on behalf of the Congressman Devin Nunes. As reported in social media circles the lawsuit is considered to be a joke – that is, stillborn and used to grab cheap headlines. See *Rep. Devin Nunes’s bizarre \$250 million lawsuit against Twitter, explained* (Internet URL: <https://www.vox.com/policy-and-politics/2019/3/20/18272786/devin-nunes-twitter-lawsuit-trump-social-media-law>) [EXHIBIT TWELVE] Quoting VOX NEWS in relevant part:

But Nunes said in an interview with Fox News host Sean Hannity that rather than being an example of excessive litigiousness, his complaint is intended to be “the first of many” such lawsuits against social media platforms. He argued that Twitter is the “main proliferator” of “slandorous” news and even added that he considered his lawsuit part of the Russia investigation (speaks to improper purpose).

43. In 2018 the Plaintiff RDS was recorded dispensing advice to another YouTube celebrity known as “DAVID SEAMAN” . In the subject video the Plaintiff is heard encouraging the filing of lawsuits against social media companies. See *Robert David Steele Exposed: Wants thousands of law suits to take down social media. With the right attorney...Steven Biss?* (Internet URL: <https://vimeo.com/335290980>). [EXHIBIT THIRTEEN]. Quoted in relevant part:

“Lawsuits against these guys. And I won’t talk about lawsuits. Other than to say that guys like you should be suing the crap out of YouTube.

And

That’s a very intelligent observation because the legal system is rigged.”

44. With the foregoing as background, the Plaintiff’s attorney has the audacity to assert that somehow the Movant’s participation in this litigation (commonly known as a “fake lawsuit”

thanks to Def Goodman) would be improper. Easy for Mr. Biss to say. He is not inconvenienced in the slightest by the open-ended smear campaign of the Def Goodman.

45. The Plaintiff and his attorney are not addressed in Crowdsorce The Truth (CSTT) smear campaigns (5-6 hours of content a week directed at Movant). As a matter of fact, the Def Goodman rarely talks about the characteristics or background of the Plaintiff. Def Goodman does not make twice weekly podcast shows about the Plaintiff RDS (even though RDS continues to make celebrity appearances on social media talk shows). **[EXHIBIT SIXTEEN]**

46. The injuries to the undersigned are continuous and open-ended and remain unabated. On 4/30/2019 the Def Goodman implicates the Movant in a conspiracy with Plaintiff RDS and Queen Tut (Susan Holmes) [see tri-partite conspiracy] in another sham “news program” on the CSTT media empire. But, the Plaintiff’s attorney does not believe the Movant should be afforded an opportunity to defend himself against such accusations involving a defendant (Queen Tut) and the Plaintiff [RDS]. in this lawsuit.

47. Most likely Mr. Biss is concerned that the Movant might re-frame this litigation with the addition of relevant evidence about the true motives of the parties to this case. The Plaintiff probably does not wish the Movant to participate in these proceedings due to his glaring conflict of interest and his affection for the Movant’s brother -- George Webb Sweigert.

EXISTING PARTIES DO NOT ADEQUATELY

REPRESENT MOVANT’S INTERESTS

48. The integration of YouTube personalities and celebrities (DEFANGO) into the initiation of this lawsuit, to include the *tip of the spear* plan of an Arizona lawsuit (“**Manny is the one who**

will be in front”), creates a shadow of doubt about the sincerity of the Plaintiff to successfully protect his own interests, let alone the Movant’s. Simply stated, the Plaintiff apparently believed the lion’s share of litigation activity would take place in Arizona and not in Virginia.

49. Additionally, the filing of a lawsuit against Twitter on behalf of Congressman Devin Nunes by Mr. Biss, esq. acts as a contributing factor to an overall suspicion that these types of lawsuits may be designed for high visibility in social media or the mainstream press (publicity stunts). This type of litigation is known as *marketing through lawsuits* and speaks to a lack of sincerity and integrity (improper purpose) and creates doubt as to the legitimate pursuit of this lawsuit to a final conclusion.

50. Suspicious conditions such as these do not add confidence to the foundation and integrity of this litigation and should not be tolerated by this Court. YouTube podcast videos displaying draft complaints for the Arizona courts (with Plaintiff’s messages to George Webb Sweigert that **“Manny is the one who will be in front”**) create doubt in the undersigned’s mind that the Plaintiff plans to vigorously pursue this litigation. The Court should also be doubtful.

51. This *“headlines through litigation”* technique is also practiced by George Webb Sweigert, who filed a total of three lawsuits in the U.S. District Court for the District Columbia. George Webb distributed well over 25 podcasts discussing these lawsuits and proclaiming himself to be a patriotic American fighting the *deep state*. One of these lawsuits was against the former U.S. House of Representatives Inspector General Theresa Grafenstine (who both Webb and the Def Goodman smeared in a coordinated social media campaign). Publicity stunt lawsuits filed by George Webb (Sweigert) include:

<u>1:17-cv-02223-RC</u>	SWEIGERT et al v. PEREZ et al	filed 10/26/17	closed 09/21/18
<u>1:17-cv-02330-RC</u>	SWEIGERT et al v. PODESTA et al	filed 11/06/17	closed 09/21/18

<u>1:17-cv-02461-EGS</u>	SWEIGERT v. MCCABE et al	filed 11/15/17	closed 01/07/19
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52. The matter of 1:17-cv-02330-RC was appealed and affirmed [**EXHIBIT FOURTEEN**].

53. Caveat: George Webb visited the private workplace of retired Theresa Grafenstine in Virginia as did Def Goodman at a professional private workshop in San Diego, California where Mrs. Grafenstein was speaking. Both videos were designed to create embarrassment and humiliation for the ex-Inspector General. This stunt created the appearance of a double-team punch on the former Congressional employee by Webb and Goodman to gain views, new subscribers and financial contributions for “fighting the deep state”. [**EXHIBIT SEVENTEEN**]

54. *Trbovich v. United Mine Workers*, 404 U.S. at 538, is the only Supreme Court decision to squarely address the requirement of inadequate representation under Rule 24(a). The Court noted that an applicant need only show that “representation of his interest ‘*may be*’ inadequate; and the burden of making that showing should be treated as minimal.” *Id.* At 538 n 10. The court reasoned that potential conflicting duties could be imposed on the Secretary of Labor.

55. It is well established that, to show an absence of adequate representation by existing parties, an applicant for intervention need only show that their representation of interests “*may be*” inadequate, not that their representation will in fact be inadequate. *Trbovich*, 404 U.S. at 538 n.10 (1972); *Dimond v. Dist. Of Columbia*, 792 F.2d 179, 192 (D.C. Cir. 1986). This burden has been described as “minimal” (*Trbovich*, 404 U.S. at 538 n.10) and “not onerous” (*Dimond*, 792 F.2d at 192).

56. Similarly, the Movant can hardly trust the care-free foot dragging Plaintiff’s counsel to watch out for the Movant’s interests. Indeed, Plaintiff-RDS could care less about the destruction to the professional reputation of the brother of UNRIG’s potential money-maker George Webb.

Obviously, the Plaintiff is biased to the undersigned's brother George Webb – and not the undersigned. In addition, the thorny issue of behind the scenes “monkey business” casts a shadow on the Plaintiff's abilities to fairly represent the interests of the undersigned.

ECONOMY RATIONALE AND PUBLIC POLICY

SUPPORTS LITIGATING COMMON INTERESTS

57. This case represents widespread public interest issues about the use of social media memes, smear campaigns and reputation destruction campaigns. It is well known that judicial review claims can raise far wider issues of public interest that go beyond those that concern the parties directly involved.

58. The Court would be well advised to consider the “public interest” purpose of the Movant's Motion to Intervene (ECF Doc. No. 93). The Def has demonstrated by his **Port of Charleston** dirty bomb hoax that he and Crowdsourcing the Truth are a public menace. The subsequent two years since that incident have only confirmed that the Def engages in deception, collection of monies from the public under false pretenses, wide-scale defamation *per se*, slander, trade libel etc. In fact, the Def is skilled at recruiting despicable slander mongers like David Charles Hawkins of Surrey, British Columbia, Canada and Queen Tut – aka Susan Holmes and/or Susan Luzke – Fort Collins, Colorado to enhance and amplify smears.

59. The legitimacy of judicial action depends partly on the appearance of fairness. “[J]udicial action only achieves [] legitimacy by responding to . . . the demand for justice in our society.” 89 Harv L Rev at 1316 (cited in note 4). Judicial decisions that affect widespread interests may be more likely to be viewed as illegitimate when courts fail to provide persons affected by the decision with a right to be heard “before their fate is sealed”. Weinstein, 13 U.C. Davis L Rev at 232. Giving outsiders a sense of participation in the process is important; “[a]ccess to the legal

process . . . is a logical extension of realistic awareness of law as a process of social choice and policy making.” Krislo, 72 Yale L J at 721 (cited in note 14). See also Weinstein, 13 UC Davis L Rev at 232.

60. While the Plaintiff drags his feet, the general public is still susceptible to the onslaught of deception pushed by the Def Goodman and his sham experts with fake bona fides. Both Def Goodman and his sidekick Mr. Hawkins have openly called for SERCO, Inc. to have all their U.S. Government contracts terminated for their involvement in the 911 World Trade Center attacks (a matter of public concern).

61. Public policy issues intersect with this case. Public policy does not favor the continuing drum-beat of **Info Ops** styled smear campaigns (based on outright lies, falsehoods and slander) aimed at impacting critical infrastructure [**C.I.**] (Federal Bridge Certification Authority [**FBCA**] network, private companies and institutions interconnected with the **FBCA network**, and the undersigned who is a Subject Matter Expert (**SME**) on issues such as C.I. protection and the **FBCA network**. Again, the Plaintiff has no interest in these issues.

62. At the time of this writing Def Goodman and his side-kick Hawkins are blaming the Movant and his brother for the closure of the Port of Charleston – a complete falsehood, lie and smear. See the video podcast *Special Preview of MOORE / PAINE with True Pundit's Mike Moore*, 5/15/2019 (Internet URL: <https://www.youtube.com/watch?v=HFr09G5Wc1I>) “..Mr. Sweigert or his brother could have threatened the closure of the Port of Charleston..”. [**EXHIBIT EIGHTEEN**]

63. To underscore public interest in this litigation Mr. Hawkins states (in the foregoing cited video podcast), “How would the public in the United States distinguish between a Sweigert driven switch and an attack [911 WTC] by a virtual wizard called Osama Bin Laden.” Def Goodman

responds, “I think the point that were getting at is, that this could be done in a way that even Sweigert wouldn’t know. He is an ethical hacker and he is hacking in to test the resilience of something or to compromise something.”

64. While this litigation quietly stagnates (without the Movant) innocent corporations, boards of directors, government employees and private parties will endure the non-stop defamation and slander of the Def and Hawkins conspiracy theories (see SERCO, Inc., Lockheed-Martin, National Center for Missing and Exploited Children (NCMEC), EnTrust Technologies, N.M. Rothchild, the National Science Foundation, to name a few). By attempting to intervene in this case at bar, the Movant is attempting to reform the slander machine known as Crowdsourcing The Truth (CSTT) and protect innocent members of the public that must deal with the onslaught of the Def’s hoaxes, fake news, trade libel, slander, etc.

65. The Movant is a party that has personally experienced the slanderous and libelous abuse of the Def and his side-kicks. The Movant’s intervention will help others break free from the ritualistic defamation practiced by the Def on innocents (SERCO, NCMEC, EnTrust, etc.). Plaintiff cannot fully represent the interests of the Movant-intervenor because he will advance an interest in litigation that is significantly different from, and possibly adverse to, that of the Movant-intervenor.

PRINCIPLES OF ANCILLARY

JURISDICTION OF FEDERAL COURTS

66. The doctrine of ancillary jurisdiction developed to empower a federal court to hear some counterclaims and third-party claims over which it lacked an independent jurisdictional base. See *Moore v. New York Cotton Exchange*, 270 U.S. 593 (1926). Generally, when a claim bore a logical relationship to the main claim or arose out of the same transaction or occurrence, courts

permitted ancillary jurisdiction. Ancillary jurisdiction may extend to claims having a factual and logical dependence on "the primary lawsuit," *Owen Equipment & Erection Co. v. Kroger*, 437 U.S. 365, 376 (1978). Much of the facts brought forth by the Movant interlock with the foundational lawsuit [ECF Doc. No. 39].

67. There are three factors for a court to consider when an intervenor-applicant claims a public policy rationale for intervention: (1) efficiency of adjudication, (2) the interests of the parts in the litigation, (3) the effect the outcome of the action might have on public policy. The application of this ancillary doctrine to these factors fosters judicial efficiency, procedural convenience, and party fairness by creating one sensible litigation package.

THE IMPACT OF STARE DECISIS

68. Without some type of remedial gag order to squelch the constant defamation *per se*, slander and trade libel broadcasts of the Def, the Court should strongly consider the interests of the intervenor-applicant in the *stare decisis* impact a decision in this case may have on a companion case (if filled by the undersigned). Certain circumstances may entitle a party to intervene as of right to protect its interests that would be affected by the *stare decisis* effects of a decision by this Court. Indeed, "[t]he central purpose of the 1966 amendment [to rule 24] was to allow intervention by those who might be practically disadvantaged by the disposition of the action and to repudiate the view, expressed in authoritative cases under the former rule, that intervention must be limited to those who would be legally bound as a matter of res judicata." Wright & Miller, Federal Prac. & Pro. § 1908.2 (footnotes omitted). *Stare decisis* may justify either intervention as of right or permissive intervention.

69. The Court should imagine the undersigned litigating a cousin lawsuit on a parallel track in another district court. This case and the cousin lawsuit will essentially be litigating identical

issues – namely the industrial grade slander and smear machine operated by the Def. Intervention is proper where intervenors and plaintiffs “have each contended that their respective rights under Title VII and under 1981 have been violated by the same practices of the defendants”); *Foster v. Gueory*, 655 F.2d 1319, 1324-25 (D.C. Cir. 1981).

THE UNDERSIGNED SHOULD BE GRANTED THE
OPPORTUNITY TO PROTECT HIS INTERESTS.

70. Assuming *arguendo*, that two cousin lawsuits proceed (the present lawsuit and a new lawsuit filed by the undersigned) the remarkably similar legal issues – vital to both cases – will be bifurcated with the practical effect of clogging the already limited resources of the federal courts.

The Movant may have to serve additional parties, like the Plaintiff, Queen Tut, the Def, etc.

71. The Court should consider that the Movant (intervenor) has demonstrated that he has Article III standing – which is not a requirement for intervention (unless relief sought is significantly different from the original plaintiff). The Movant has demonstrated his standing in this litigation. The subject of this litigation is germane to the Movant’s interests. *Hunt v. Wash. State Apple Advert. Comm’n*, 432 U.S. 333 (1977).

WISDOM OF THE FOURTH
CIRCUIT TO PROVIDE FOR APPEAL

Bridges v. Dep’t of Md. State Police, 441 F.3d 197, 207-09 (4th Cir. 2006) (recognizing settled “principle that denial of a motion to intervene is an appealable final order”).

Stringfellow v. Concerned Neighbors in Action, 480 U.S. 370, 377 (1987) (“[W]hen an order prevents a putative intervenor from becoming a party in any respect, the order is subject to immediate review.”)

CONCLUSION

The intervener-applicant has something to contribute that has not already been said by the parties directly involved. An intervention is of no use if it repeats points made by someone else. All the past pleadings of the Movant have brought fresh information to the Court's attention that is germane to this controversy. The undersigned is intrinsically involved via the relationship of his brother (George Webb), the Plaintiff's affection for Webb, Queen Tut's slander on the 4/30/2019 CSTT video podcast, etc.

Neither the Movant or this Court can trust the Plaintiff to protect the interests of the Movant. There is an adversity of interest on the part of the Plaintiff to protect the Movant's brother (George Webb). This is contrary to the Movant's interests. Plaintiff RDS will not defend the rights of the Movant – which includes the undersigned's interest in a good technical, business and professional reputation (as established by law in the Commonwealth of Virginia in the area of defamation *per se* claims). The weekly impact of the defamation *per se* and slander by the Def Goodman is felt most strongly by the undersigned and not the Plaintiff.

The undersigned should be allowed to have access to this Court in fulfillment of constitutional rights. The Plaintiff's Memorandum [ECF No. 107] does not overcome this constitutional obstacle.

The Def Goodman is not making content about Robert David Steele (as a public figure) continues to make celebrity appearances on social media talk shows. As a matter of fact, the Def Goodman rarely talks about the characteristics or background of the Plaintiff. Certainly not 5-6 hours weekly.

The weekly impact of the defamation and slander by the defendant is felt most strongly by the undersigned and not the plaintiff. The bulk of the plaintiff's injuries has occurred more than 12 months ago. Meanwhile the current injuries to the undersigned are continuous and open-ended. The Movant's claims have questions of fact and law in common with those already before this Court. The Plaintiff is not an adequate representative of the Movant's claims and interests.

In this Circuit, a court shall grant intervention as of right if an intervenor makes a timely motion and can show (1) an interest in the subject matter of the action, (2) that the protection of this interest would be impaired by the disposition of this action, (2) that the protection of this interest would be impaired by the disposition of this action, and (3) that the interest is not adequately represented by existing parties to the litigation. See Fed. R. Evid. 24(a); *In re Sierra Club*, 945 F.2d 776, 779 (4th Cir. 1991) ("must show interest, impairment of interest, and inadequate representation"); *Teague v. Bakker*, 931 F.2d 259, 261 (4th Cir. 1991) (citing *Virginia v. Westinghouse Elec. Corp.*, 542 F.2d 214, 216 (4th Cir. 1976)). These requirements should be interpreted broadly, as "liberal intervention is desirable to dispose of as much of a controversy involving as many apparently concerned persons as is compatible with efficiency and due process." *Feller v. Brock*, 802 F.2d 722, 729 (4th Cir. 1986).

This Court should consider allowing the intervenor-applicant to proceed as a limited intervenor-plaintiff for the purposes of seeking injunctive relief. In this manner, there will be no direct impact to the tempo of this litigation due to the undersigned's participation in the lawsuit.

This Court has the inherent power to inquire into the outlandish claims that bring great discredit upon the administration and efficiency of justice. The integrity of this Court is tarnished if the Court allows litigants to launch public smear campaigns in an extra-judicial fashion (under the unsuspecting eyes of the Court).

The United States Supreme Court has held that an applicant must make only a minimum showing that the parties in the action may not represent adequately the applicant's interest to fulfill the requirements of the Rule 24(a)(2) four-part test. The applicant has met this burden.

The Movant (undersigned) has a direct, substantial, and legally protectable interest in the outcome of this litigation.

The Movant has exceeded his burden in this matter.

Respectfully submitted under oath that the foregoing is true and accurate. Signed this 15 day of May, 2019.


D. George Sweigert, c/o
P.O. Box 152
Mesa, AZ 85221

Spoliation-notice@mailbox.org

EXHIBITS

The undersigned certifies under penalties of perjury that the attached materials are true and accurate copies of the original source instances.

I hereby certify that the attached are true and accurate copies of the original source documents or Internet screen shots.

Certified this 15 day of May, 2019.

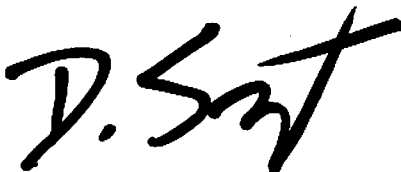
A handwritten signature in black ink, appearing to read "D. Sant". The signature is written in a cursive, stylized font with a large, sweeping "S" and a distinct "T" at the end.

EXHIBIT ONE

Case 1:18-cv-08653-VEC Document 65 Filed 11/16/18 Page 2 of 6

WHEREAS the parties have collectively filed over twenty motions in the last five months;

IT IS HEREBY ORDERED that all pending motions and deadlines are STAYED pending the resolution of this Order to Show Cause. Furthermore, until further order from this Court, **neither party is permitted to file any further motions or pleadings** except in response to this Order to Show Cause. Any submission filed in violation of this Order may be denied or stricken on that basis alone, without further notice to either party, and the filing party may be subject to sanction.


Case 1:18-cv-08653-VEC Document 65 Filed 11/16/18 Page 6 of 6

Plaintiff's reply, if any, shall be no longer than 10 pages with the same specifications. Any filing submitted in violation of those requirements may be stricken in its entirety or in part.

The Clerk of the Court is respectfully directed to mail a copy of this Order to both parties and to note the mailings on the docket.

SO ORDERED.

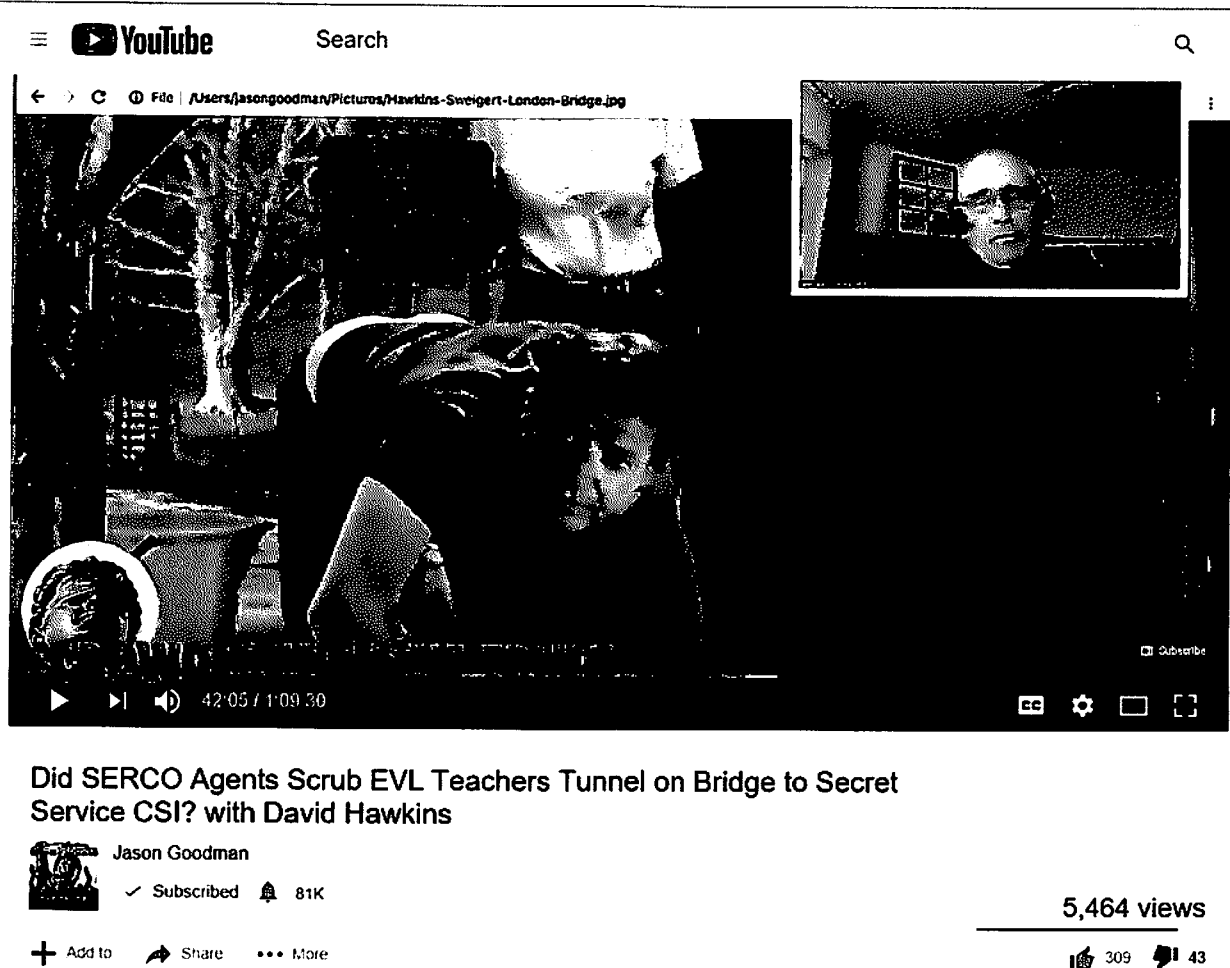
Dated: November 16, 2018
New York, NY


VALERIE CAPRONI
United States District Judge

11/16/2018	<u>65</u>	ORDER TO SHOW CAUSE. IT IS HEREBY ORDERED that all pending motions and deadlines are STAYED pending the resolution of this Order to Show Cause. Furthermore, until further order from this Court, neither party is permitted to file any further motions or pleadings except in response to this Order to Show Cause. Any submission filed in violation of this Order may be denied or stricken on that basis alone, without further notice to either party, and the filing party may be subject to sanction. IT IS FURTHER ORDERED that Plaintiff show cause, no later than December 28, 2018, why his amended complaint should not be dismissed and why his motion for leave to file a second amended complaint (Dkt. 39) should not be denied as futile. Specifically, Plaintiff's response to this Order must: Show cause why his claims asserting violations of criminal law should not be dismissed for lack of standing, and as further specified and set forth in this Order to Show Cause. IT IS FURTHER ORDERED that Defendant may (but need not) file a brief in support of this Order that responds to any arguments made in Plaintiff's response to this Order by January 15, 2019. If Defendant files an opposition, then Plaintiff may file a reply no later than January 30, 2019. IT IS FURTHER ORDERED that both parties must strictly adhere to page limits when submitting their responses to this Order. Both Plaintiff's response and Defendant's opposition (if any) are to be no longer than 25 pages, double-spaced, 12-point font, with one-inch margins. Plaintiff's reply, if any, shall be no longer than 10 pages with the same specifications. Any filing submitted in violation of those requirements may be stricken in its entirety or in part. The Clerk of the Court is respectfully directed to mail a copy of this Order to both parties and to note the mailings on the docket. SO ORDERED. (Replies due by 1/30/2019.) (Signed by Judge Valerie E. Caproni on 11/16/2018) (jim) (Entered: 11/19/2018)
11/16/2018		Transmission to Docket Assistant Clerk. Transmitted re: <u>65</u> Order to Show Cause. Set Deadlines to the Docket Assistant Clerk for case processing. (jim) (Entered: 11/19/2018)
11/16/2018	<u>66</u>	PLAINTIFF'S SIXTEENTH REQUEST FOR JUDICIAL NOTICE [16-RJN]. Document filed by D. George Sweigert. (sc) (Entered: 11/20/2018)
11/16/2018	<u>67</u>	LETTER from D. George Sweigert, dated 11/11/18 re: Plaintiff write that, as a preliminary matter, the defendant has filed his fourth pleading without the necessary verification under oath as required by Local Rule 7.1; and that he has been warned on several occasions that such pleadings (lacking a 7.1 verification) can be treated as a legal nullity pursuant to the laws promulgated by the New York Legislature etc. Document filed by D. George Sweigert.(sc) (Entered: 11/20/2018)
11/19/2018		Mailed a copy of <u>65</u> Order to Show Cause, Set Deadlines, to D. George Sweigert c/o P.O. Box 152 Mesa, AZ 85211; Jason Goodman 252 7th Ave, #6s New York, NY 10001. (vba) (Entered: 11/19/2018)
01/15/2019	<u>75</u>	DEFENDANT'S OPPOSITION(Affirmation) TO PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE; re: <u>72</u> Reply. Document filed by Jason Goodman. (sc) (Entered: 01/16/2019)
01/23/2019	<u>76</u>	PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION; re: <u>75</u> Affirmation in Opposition. Document filed by D. George Sweigert. (sc) (Entered: 01/24/2019)

EXHIBIT TWO

Internet URL: https://www.youtube.com/watch?v=7vkYxV_dTbs



Steamed live on April 10, 2019

Are devious Social Engineers using principles outlined in Split Tunneling patents to send bits of data in packets known only to authorized parties on a network? Could such an approach be used to break the chain of custody of key evidence and frustrate investigators while scrubbing truth from a crime scene? David Hawkins joins me to explore the roles of self styled "ethical hackers" and their affinity for Weathermen and the systematic assassination fo the truth.

visit David's website – <https://reversecsiscripts.com/>

follow David on Twitter – <https://twitter.com/CsiHawkins>

Highlights of comments:

Mr. Sweigert deserves discomfort on a large scale

Pursued by Manual Chavez and Manual Chavez and his associates – including Sweigert – time and location.

This is very interesting Mr. Sweigert USSS is a core member of the NCMEC.

Kristine Marcy created the NCMEC children in 1984.

1984 founded CON AIR. Access to NCMEC child, transported prisoners, gathering funds via asset forfeiture. I think she played a key role in developing this split tunneling technique (evil teacher's community).

10:31 Benet Ramsey note, breaking the chain of custody. In these frivolous lawsuits in which Sweigert accused me that I had broken the chain of evidence. "Counter-measure".

10:32 Sweigert worked at BAH on classified network. He describes himself as a social engineer. TOPOFF continuity of government exercise. Switch from COOP to live fire perpetrated by David Sweigert.

10:41 Dave Sweigert is so dumb limiting the ability of the USSS to investigate London knife, Ramsey, 9/11. If you are removing evidence from the crime scene are entitled to an aggressive inference of guilt.

10:42 I suggest Sweigert take his head out of where the sun doesn't shine. Maybe you could help us solve the crime instead of causing problems of evidence.

10:46 "decentralized distributed harassment campaign"

11:07 MURDER FOR HIRE, split tunnel,

11:09 one such person would be David Sweigert [network revocation] Treasury London Bridge
[certificates] [2017]

EXHIBIT TWO – CON'T

Internet URL: <https://www.patreon.com/posts/26422392>

Apr 28 at 5:19pm

**Serco's EVL Teachers' Patentor Pension Fraud—AI Red Team Crime Scene Tunnels—
Novichok And The Cass Of The Poisoned Bishop: With David Hawkins Discovery CSI**

**SERCO'S EVL TEACHERS' PATENTOR PENSION FRAUD—AI RED TEAM CRIME
Scene Tunnels—Novichok And The Cass Of The Poisoned Bishop:
With David Hawkins Discovery CSI**

— SUBMITTING POST —

ANDY STEELE

DISCUSSES

CONSPIRACY THEORIES:
CAUSES AND CURES



A PAPER WRITTEN BY
CASS SUSTEIN AND
ADRIAN VERMEULE

9/11 FREE FALL RADIO
THURSDAYS 10PM EDT
APRIL — 2017

theunholy.org @theunholy

FOR MORE INFORMATION

Conspiracy Theories: Causes and Cures

Cass Sustein Adrian Vermeule



David Hawkins

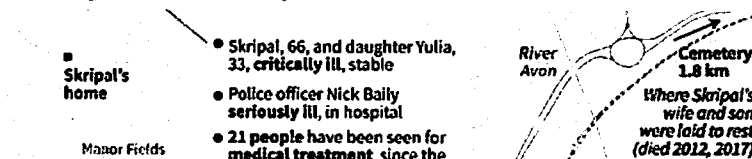
Become a patron

TIER BENEFITS

RECENT POSTS

Attack on former Russian colonel Sergei Skripal

Experts at Porton Down laboratories have identified the substance used as a military-grade nerve agent "of a type developed by Russia", and part of a group of such agents known as Novichok, according to British PM Theresa May



My storyboards suggest that, subsequent to 9/11, Ms. Baginski directed Cass Sunstein, former head of the White House Office of Information and Regulatory Affairs in the Obama administration from 2009 to 2012, and Air Force vet and ethical hacker David Sweigert, to deploy 'cognitive infiltrators' to scrub the websites of private investigators and hide alleged Con Air Red Team attempts to intimidate or even kill whistle-blowers including Sergei Skripal, a former Russian military officer and double agent for the UK's intelligence services, and his daughter Yulia Skripal who were poisoned in March 2018 in Salisbury, England, with a Novichok nerve agent in a formulation corresponding to stocks held by Northwestern University, or Bishop Larry Gaiters who describes below a recent poison attack with an as-yet unidentified biological agent

My storyboards indicate that Baginski, Sunstein and Sweigert worked with Wilbur Ross—25 years with Serco, QEll and President Trump's investment banker N M Rothschild & Sons Ltd—to infiltrate public or private crime scene investigations, track victims or patsies with Con Air/Eduroam patented devices and fraudulently reward Red Teams with AI-calculated credits in the weight of carbon saved at HVT or mass-casualty events after custody of CSI data has been split between three 'client' community tunnels..

The storyboards indicate that Serco/CAI agents hired Baginski, a former NSA Signals Intelligence (SIGINT) Director, David "Incident Commander" Sweigert and Maxar Technologies director Joanne Isham, formerly responsible to Clinton's disgraced CIA Director John Deutsch for clandestine technical activities with the UK MOD over the federal bridge certification authority, to equip BBC scriptwriters and the EVL AI Teachers with split-tunnel networks to prevent the USSS from investigating a series of dead-pool attacks designed to complete on 9/11 what Bernardine Dohrn and Bill Ayers started in the 1970s.

I note that Sweigert ran classified network projects for Booz Allen & Hamilton—outsourcer with Serco Resilience and EVL Teachers who allegedly spot fixed body counts for a 9/11 TOPOFF exercise and in which he claimed to have completed two computer forensic projects for the US Secret Service.

The storyboards suggest that Serco's V-P Baginski is using Sweigert red teams and Other Transaction Authority to integrate SPAWAR (now NESS) with Eduroam and allow the EVL Teachers to conceal a Starnet child pornography trade, dead-pool betting, network intrusions, IP crimes and the custodians of a patent-for-rent murder-for-hire network responsible for the wrongful deaths of 50 victims in the Christchurch mosque shooting and nearly 300 victims in the Easter Sunday bombings in Sri Lanka.

Mr. President, to drain the swamp, I suggest you order the U.S. Secret Service to pull the Serco plug, investigate the use of AI algorithms to control the outcome of crime scene investigations and treat the apparent poisoning of Bishop Gaiters as an attack on the First Amendment by what David Rockefeller recognized as proponents for the supranational sovereignty of an intellectual elite and world bankers.

Yours—as ever—deductively,

David Hawkins,

B.A. (Hons.) Cantab

EXHIBIT THREE

Internet URL:

<https://www.nytimes.com/2004/12/06/nyregion/judges-decisions-are-conspicuously-late.html>

Judge's Decisions Are Conspicuously Late

By BENJAMIN WEISER DEC. 6, 2004

They are kept in federal courthouses across the United States, although, understandably, they are not prominently displayed: lists of cases that have dragged on for months or even years, often because a judge has failed to make a key ruling.

But there is one unchallenged king of delayed decisions: Judge George B. Daniels of Federal District Court in Manhattan, who, the latest statistics show, had 289 motions in civil cases pending for more than six months, by far the highest total of any federal judge in the nation.

For some plaintiffs, the waits have seemed like forever.

There was the woman in Queens who had to fend off creditors while she waited more than three years for the judge to decide that she was entitled to her late ex-husband's pension benefits. And there was the prisoner with H.I.V. who filed a petition challenging his state court conviction. By the time Judge Daniels got around to issuing an order -- three years later -- the

EXHIBIT FOUR

Internet URL: http://www.ca2.uscourts.gov/circuit_executive/Reports/06/SDNY.pdf

STATISTICS

SOUTHERN DISTRICT

OF NEW YORK

SOUTHERN DISTRICT OF NEW YORK

Years Ending September 30th.

Authorized Judgeships. 28

Senior Judges. 21

	Civil Cases			Criminal Cases*			Total Cases		
	2005	2006	Change	2005	2006	Change	2005	2006	Change
Filed	11453	10793	-5.8%	2105	1630	-22.6%	13558	12423	-8.4%
Per Judgeship - Unweighted	381	356		77	61		458	417	-9.0%
Per Judgeship - Weighted **	470	441	-6.2%	79	58	-26.6%	549	499	-9.1%
Terminated	9872	9766	-1.1%	1696	1907	12.4%	11568	11673	0.9%
Per Judgeship	353	349		61	68		413	417	
Pending***	15825	16852	6.5%	5728	5343	-6.7%	21553	22195	3.0%
Per Judgeship	565	602		205	191		770	793	
Trials Completed	245	204	-16.7%	172	169	-1.7%	417	373	-10.6%
Per Judgeship	9	7		6	6		15	13	
Inventory Control Index (Mos.)	19.2	20.7	1.5	40.5	33.6	-6.9	22.4	22.8	0.5
Median Time Filing to Disp. **	8.8	8.3	-0.5	14.5	16.4	1.9	#N/A	#N/A	#N/A

*Source: US District Court

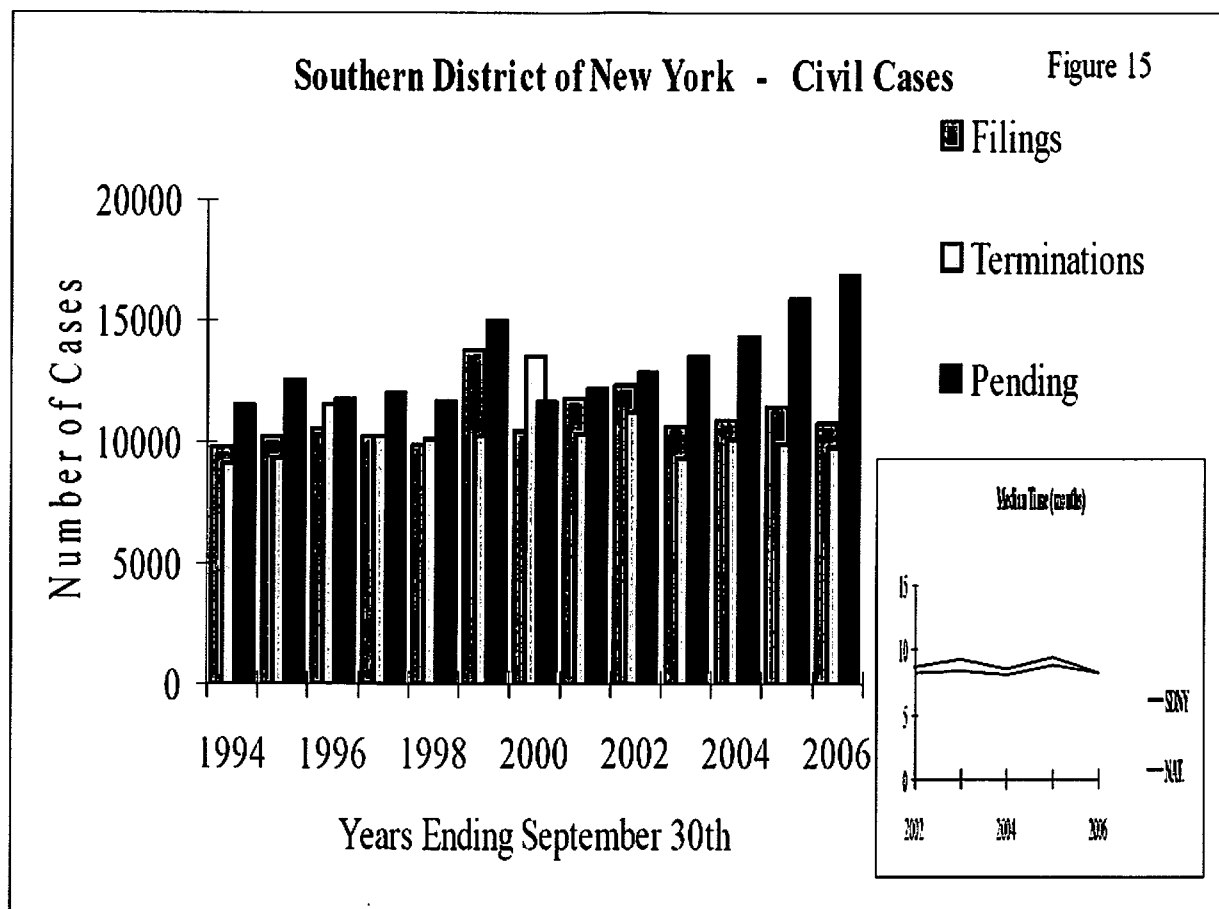


EXHIBIT FOUR -- CONTINUED

Internet URL:

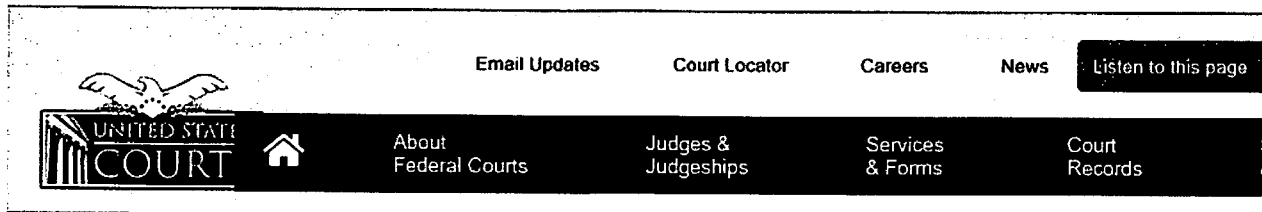
[https://en.wikipedia.org/wiki/United States District Court for the Southern District of](https://en.wikipedia.org/wiki/United_States_District_Court_for_the_Southern_District_of)**New York**

147	District Judge	Vernon S. Broderick	Manhattan	1963	2013–present	—	—	Obama
148	District Judge	Gregory Howard Woods	Manhattan	1969	2013–present	—	—	Obama
149	District Judge	Valerie E. Caproni	Manhattan	1955	2013–present	—	—	Obama
150	District Judge	<i>vacant</i>	—	—	—	—	—	—
151	District Judge	<i>vacant</i>	—	—	—	—	—	—
152	District Judge	<i>vacant</i>	—	—	—	—	—	—
153	District Judge	<i>vacant</i>	—	—	—	—	—	—
154	District Judge	<i>vacant</i>	—	—	—	—	—	—
155	District Judge	<i>vacant</i>	—	—	—	—	—	—
79	Senior Judge	Charles S. Haight Jr.	New Haven, CT ^(Note 1)	1930	1976–1995	—	1995–present	Ford
89	Senior Judge	John F. Keenan	Manhattan	1929	1983–1996	—	1996–present	Reagan
91	Senior Judge	Louis L. Stanton	Manhattan	1927	1985–1996	—	1996–present	Reagan
92	Senior Judge	Kimberly Wood	Manhattan	1944	1988–2000	2008–2009	2009–present	Reagan



EXHIBIT FOUR – CONTINUED**Internet URL:****https://www.uscourts.gov/sites/default/files/fcms_na_distprofile1231.2018.pdf**

NEW YORK SOUTHERN			U.S. District Court — Judicial Caseload Profile					
			12-Month Periods Ending					
			Dec 31 2013	Dec 31 2014	Dec 31 2015	Dec 31 2016	Dec 31 2017	Dec 31 2018
Overall Caseload Statistics	Filings ¹		12,093	13,359	12,490	12,983	12,721	15,104
	Terminations		12,118	13,375	13,196	13,772	12,179	13,094
	Pending		18,844	18,706	17,972	17,191	17,255	19,239
	Percent Change in Total Filings Current Year Over Earlier Year		24.9	13.1	20.9	16.3	18.7	
	Number of Judgeships		28	28	28	28	28	28
Vacant Judgeship Months ²			43.8	0.0	5.0	12.0	26.9	52.3
Actions per Judgeship	Filings	Total	432	477	446	464	454	539
		Civil	347	411	380	374	379	457
		Criminal Felony	59	44	46	58	49	53
		Supervised Release Hearings	26	23	20	32	27	30
	Pending Cases ²		673	668	642	614	616	687
	Weighted Filings ²		439	432	458	463	467	575
	Terminations		433	478	471	492	435	468
	Trials Completed		15	14	14	15	15	15



Statistics & Reports

Data Tables

Table N/A—U.S. District Courts—Combined Civil and Criminal Federal Court Management Statistics (December 31, 2018)

Table N/A—U.S. District Courts—Combined Civil and Criminal Federal Court Management Statistics (December 31, 2018)

U.S. District Courts—Federal Court Management Statistics—Profiles—During the 12-Month Periods Ending December 31, 2013 Through 2018

DOWNLOAD DATA TABLE

(PDF, 948.98 KB)

DOWNLOAD DATA TABLE

(XLSX, 350.78 KB)

Share This Page



Reporting Period End Date: December 31, 2018

Publication Name: Federal Court Management Statistics

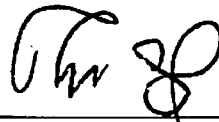
Topic(s): Civil, Criminal, Petit Jury, Trials, Judgeships

2:18-cv-01633-RMG Date Filed 09/17/18 Entry Number 27 Page 4 of 4

IV. Conclusion

For the foregoing reasons, the R & R of the Magistrate Judge (Dkt. No. 22) is **ADOPTED** as the Order of the Court. Plaintiff's motions to show cause (Dkt. Nos. 7, 8), motion to strike (Dkt. No. 12) and motion for leave to amend his motion to show cause (Dkt. No. 17) are **DENIED WITHOUT PREJUDICE**. Defendant's motion to dismiss (Dkt. No. 9) is **DENIED WITHOUT PREJUDICE**. This case is **TRANSFERRED** to the United States District Court for the Southern District of New York.

AND IT IS SO ORDERED.



Richard Mark Gergel
United States District Court Judge

September 17, 2018
Charleston, South Carolina

EXHIBIT SIX

Internet URL: <https://phibetaiota.net/2017/06/robert-steele-with-george-webb-unrig/>


PUBLIC INTELLIGENCE BLOG
The truth at any cost lowers all other costs





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[Links](#)
[Reviews](#)
[Who](#)
[#UNRIG](#)
[#0 \(no title\)](#)

2017/06/15
Robert Steele with George Webb: #UNRIG
UPDATE 2: Continue to Support George Webb – the Facts of the Matter
Interviews



Other Audio-Visual Interviews with Robert David Steele

UPDATE 1: Since the above excellent interview was posted, in which I state with no reservation that I like George Webb and find what he does interesting (none of us are perfect), I am told that both George and Jason Goodman, his producer, have been under investigation by the FBI at the



Search


HOT TOPIC: 5G THREAT


BLOG REFERENCE SITE FREE
3-5 emaded posts daily, no ads ever.
Join 16,687 other subscribers
Email Address

9/11 POTUS – 28 MEMOS


翻译 – ПЕРЕВЕДИТЕ

66 English

HOT TOPIC: ELECTION 2020


CATEGORIES
Select Category



DONATE, GET EMAIL FROM ROBERT
<http://paypal.me/EarthIntel>
#UNRIG OUR COUNTRY!



UPDATE 1: Since the above excellent interview was posted, in which I state with no reservation that I like George Webb and find what he does interesting (none of us are perfect), I am told that both George and Jason Goodman, his producer, have been under investigation by the FBI at the request of the USCG, for their unsourced (unfounded?) false alarm over a dirty bomb on a Mersck ship in Charleston Harbor. Shutting down the port and ensuring this was a false alarm probably cost the US taxpayer over one million dollars.

--

My bottom line: George is probably an unwitting (innocent) in a disinformation campaign organized by CIA and/or Mossad and Jason is probably a sayonim (helper) of the Mossad if not a paid agent. I will continue to support George Webb — as does Cynthia McKinney — I will never again have anything at all to do with Jason Goodman whom I consider unbalanced, untrustworthy, and toxic in the extreme. George Webb needs his own channel.

--

I am so glad to hear from you. Jason appears deranged. I have not turned on George Webb, nor did I turn on Jason other than to cancel my planned interview with him in NYC, mostly because I did not want to get to NYC and find that he was in a jail cell. I offered many respectful and clear comments at the YouTube video where I praised George during our live-streaming event, and Jason has gone in and systematically deleted them. I am including Cynthia McKinney in the cc because we both take this matter very seriously and I feel it is important that you know that what I am telling you is what I am telling Cynthia.

11 I have reached out to George both via email and text offering strong support, and not heard back from him I hope he is well and reiterate my support for him and his potential role as our chronicler on the bus.

12 My door is always open for George. I consider George an unwitting (innocent) patsy in this dirty bomb matter.

13 I was just told that another hidden agenda item with Jason is that I did an interview with a guy named Manny, this was a favor to a friend that wanted to help a young talent get started, and completely unbeknownst to me, have now been told that Manny did a really ugly hateful takedown of George Webb that I do not endorse and Jason (that I somewhat sympathize with). As best I can tell, Jason has lost his mind and is projecting all his problems on me, I have had nothing to do with Jason other than the one interview and the cancellation of my interview and the phone call that he taped.

I have not lost my interest in George or my respect for George's value. From this moment forward I will continue to praise George and support George and I will never mention Jason Goodman again.

EXHIBIT SEVEN

Internet URL: <https://www.youtube.com/watch?v=GNxCk6nqFJg>

≡ YouTube Deep State Dunces Attack George Webb and CSTT – Bitcoin Challenge



The video player shows a man wearing a dunce cap with the letter 'D' on it, sitting next to a dog. The video is titled 'Deep State Dunces Attack George Webb & CSTT - Bitcoin Challenge' by Jason Goodman. The video has 15,311 views, 674 likes, and 125 comments. The video is currently at 0:03 / 23:40.

Deep State Dunces Attack George Webb & CSTT - Bitcoin Challenge

Jason Goodman

✓ Subscribed 81K

15,311 views

+ Add to Share ... More

674 125

Streamed live on Nov 27, 2017

The dumbest affiliates of the Deep State simply will not give up their ludicrous attacks on the truth, while simultaneously offering no evidence to support their claims.

Become a sponsor of Crowdsourcethe Truth and support the effort

EXHIBIT NINE

Internet URL: https://www.youtube.com/watch?v=_Xtz_S0tH1g



Streamed live on Jul 1, 2017

Today we are speaking with Robert David Steele about his #Unrig Campaign and how he plans to spend the next 90 days campaigning to educate AMERICANS across the country how to take the power back to the people. We need to take down the deep state and remove the pedofiles from power with the Help of Donald Trump leading the pack.

You can learn more about Robert at robertdavidsteele.com. The #UNRIG website is unrig.net. The fund-raiser is easily found by searching for IndieGoGo hyphen UNRIG. God Bless America, and may I say, God Bless Robert Steele, an American patriot who is incapable of telling a lie, who is devoted to the truth at any cost.

EXHIBIT NINE - CONTINUED

Internet URL: https://www.youtube.com/watch?v=Pv_C1RUo7RA





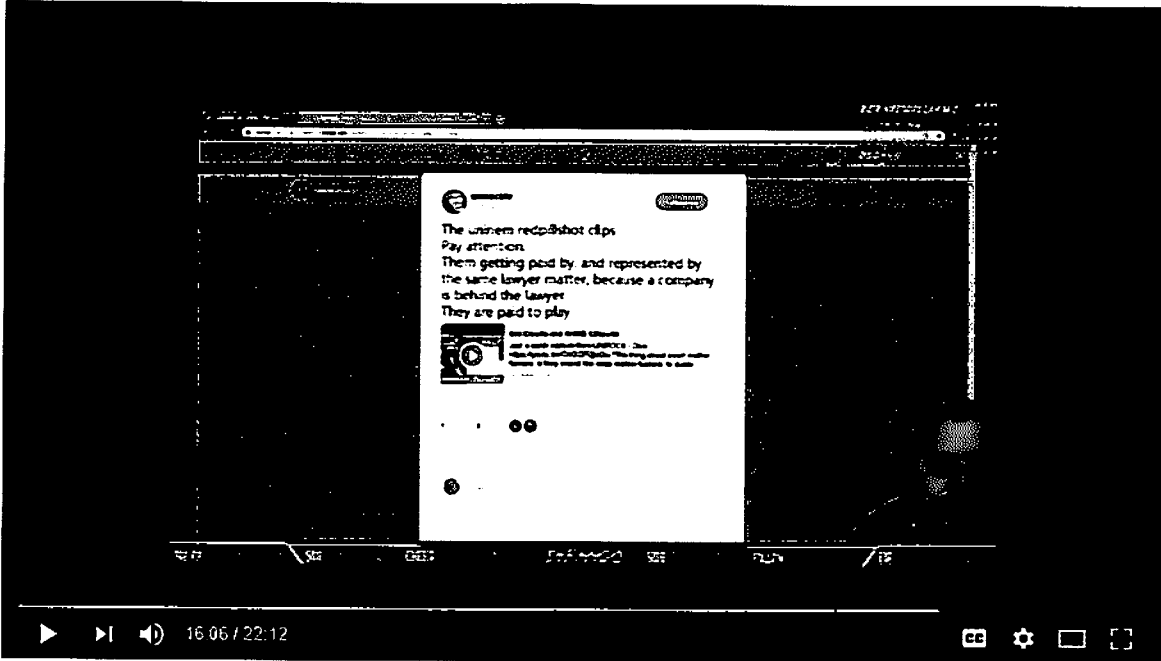
Streamed live on Dec 2, 2017

I reached out to Robert for an interview last night to see how things where going. I got a lot of things I couldn't ask or talk about and his answers to the questiosn were the same old sauce without any metal. To top it off he insulted my platform and entire following so I had to blow this guy out. I mean I have really gone out of my way to help get his message out but this draws the line. We won't be interviewing Robert anymore on this channel period.



EXHIBIT TEN


Internet URL: <https://www.youtube.com/watch?v=pnmjKgFOxGA>

 defango biss lawsuit 





Truth Convoy, Defango, and Steven Scott Biss

 Agent19
✓ Subscribed  2.2K

+ Add to  Share ... More

1,408 views

 113  11

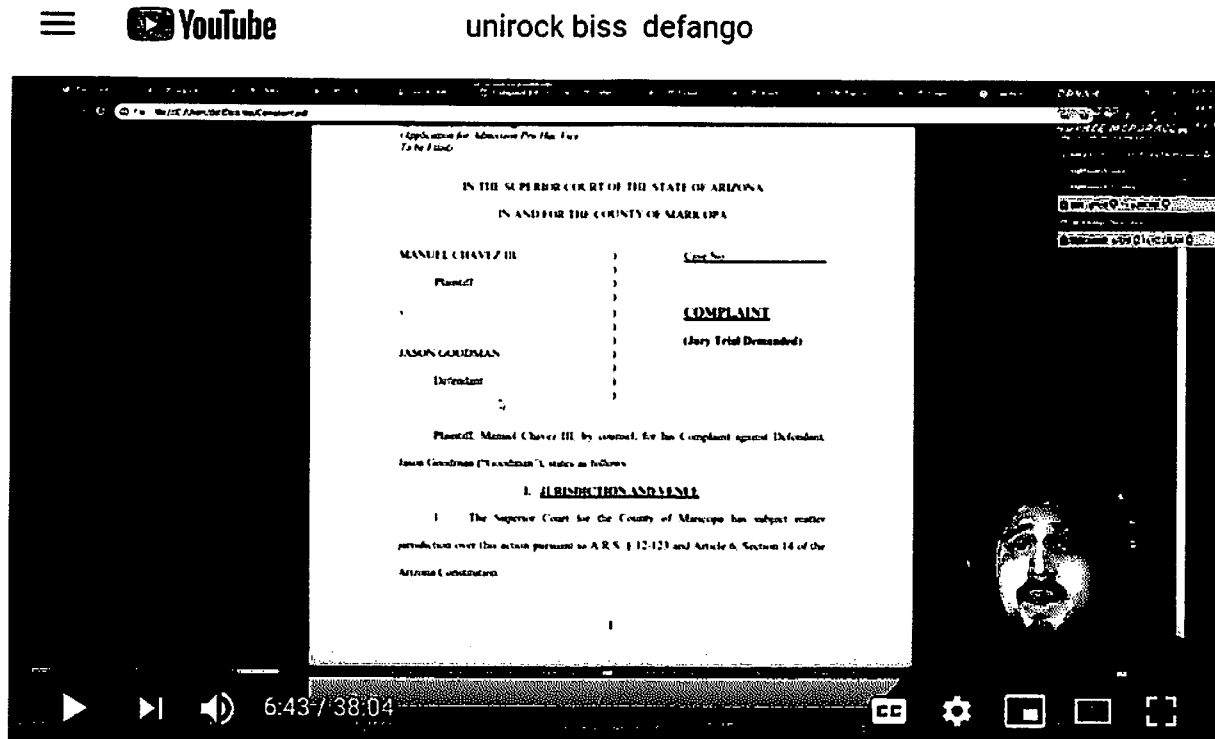
Published on Nov 16, 2018

Link to the story outlining Darren Morrison's threats against Denver International Airport:

<https://www.westword.com/news/darren-...>

EXHIBIT ELEVEN

<https://www.youtube.com/watch?v=TLKvo6qUSto>



Defango Busts Unirock's exploder {secret [shhh (#rp2pb)] } uninem rpshot

2,815 views

177 28 SHARE SAVE ...

Multistreaming with <https://restream.io/> You guys might have noticed I haven't be taking it into Unirock. Well looks like his brain has created a new narrative with people because I told people who my lawyer was. It's not like it was a secret before and I have actually said it a few times, I wonder why it's important now? Seems we where very truthful and clear about thing and Unirock is proving once again he will bend the fakes to make his mission.

Application for Adversary Proceeding
To Be Filed

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

MANUEL CHAVEZ III

Plaintiff

v.

JASON GOODMAN

Defendant

Case No. _____

COMPLAINT

(Jury Trial Demand)

Plaintiff, Manuel Chavez III, by and through, for his Complaint against Defendant,

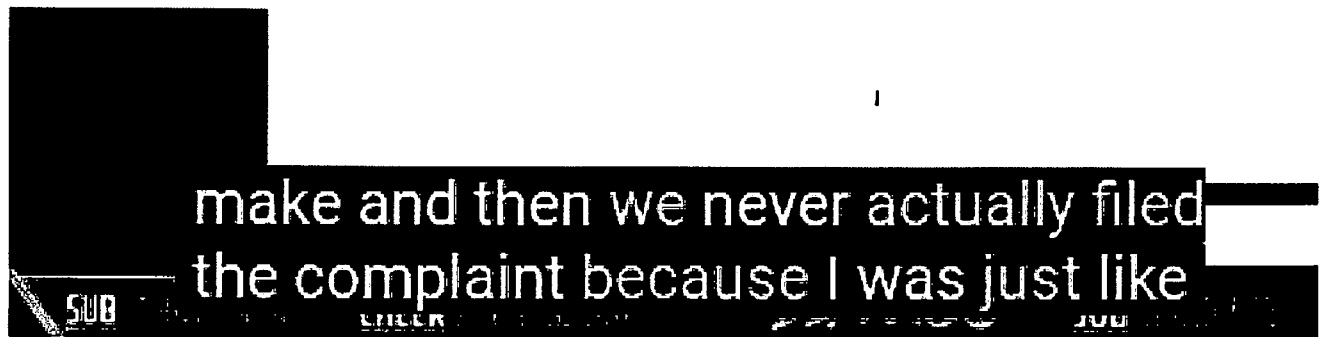
Jason Goodman ("Goodman"), states as follows:

I. JURISDICTION AND VENUE

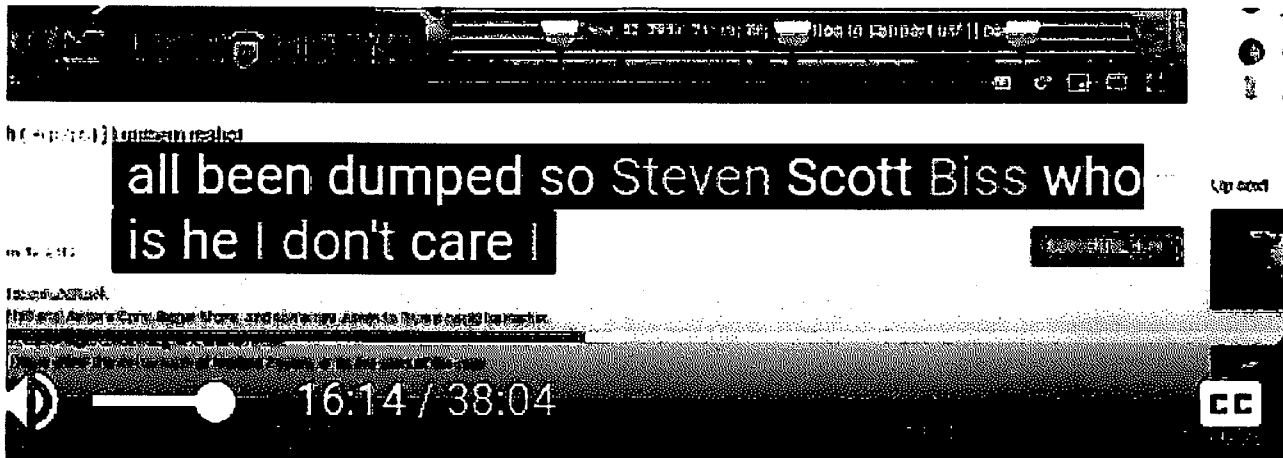
1. The Superior Court for the County of Maricopa has subject matter jurisdiction over this action pursuant to A.R.S. § 12-123 and Article 6, Section 14 of the Arizona Constitution.

Robert David Steele and I having the same lawyers because the same individual

8:46 / 38:04



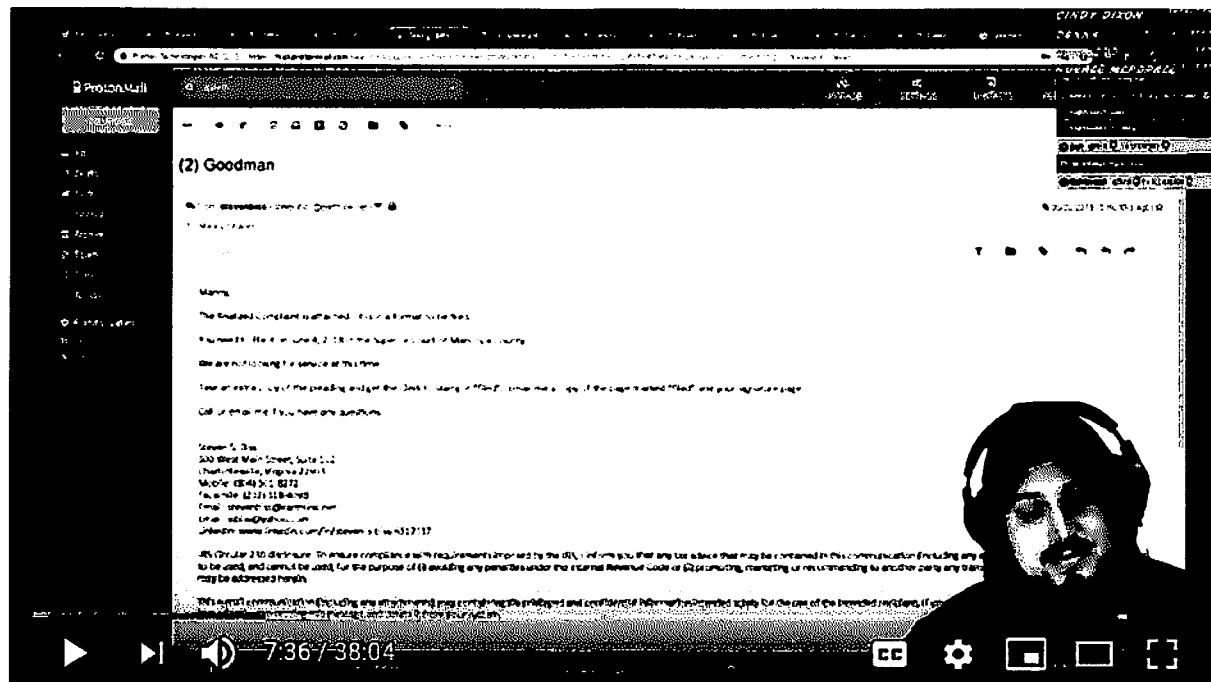
ists Uni rocks exploder {secret [shhh (#rp2p





YouTube

unirock biss defango



Defango Busts Unirock's exploder {secret [shhh (#rp2pb)] } uninem rpshot

2,815 views

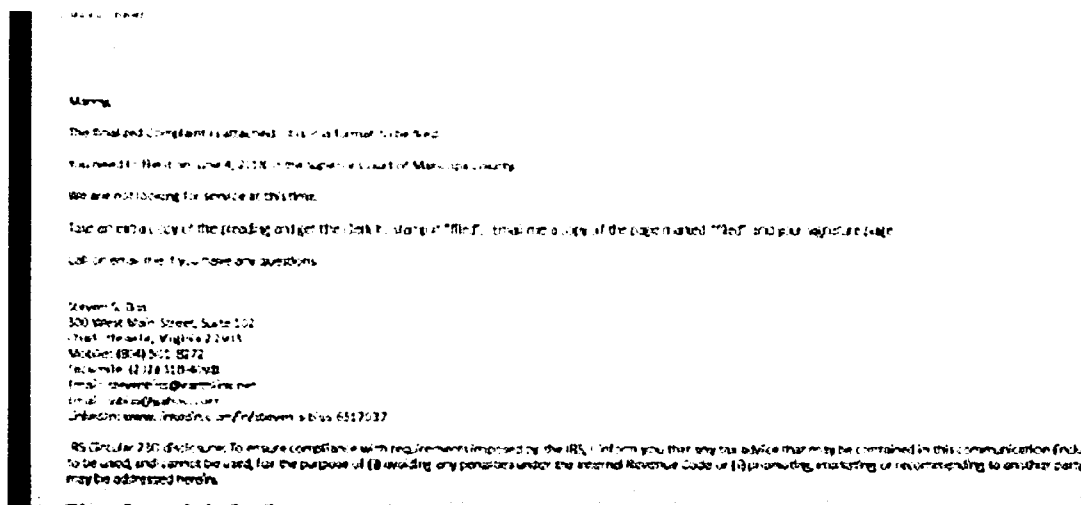
177

28

SHARE

SAVE

...



300 West 10th Street, Suite 101

Omaha, NE 68102

Phone: (402) 342-8872

Fax: (402) 342-8872

E-mail: info@omahaplanet.com

Web: www.omahaplanet.com

EXHIBIT TWELVE


Internet URL:

<https://www.vox.com/policy-and-politics/2019/3/20/18272786/devin-nunes-twitter-lawsuit-trump-social-media-law>

Rep. Devin Nunes's bizarre \$250 million lawsuit against Twitter, explained

Featuring a parody cow, a parody parent, a real Republican strategist, and a giant social media platform.

By Jane Coaston | jane.coaston@vox.com | Mar 20, 2019, 7:00am EDT

f t  SHARE



Rep. Devin Nunes (R-CA) at the Capitol on March 6, 2019, in Washington, DC. Chip Somodevilla/Getty Images

Rep. Devin Nunes (R-CA) is suing Twitter.

More specifically, Nunes is suing Twitter, a Republican strategist, and two parody Twitter accounts, one purporting to be Nunes's mother, the other purporting to be Nunes's cow. (The account is @DevinCow).

First reported by Fox News, the complaint seems to be part of a plan almost destined to backfire spectacularly in the public eye: one of the more combative and well-known figures in Congress (particularly for his defenses of President Donald Trump) deciding to sue a notoriously free-wheeling social media platform, two parody Twitter accounts, and a Republican operative who uses it frequently for \$250 million over tweets like these.

MOST READ



How Game of Thrones did Daenerys wrong



Game of Thrones' King's Landing horror fittingly reveals what the show has always been about

The complaint, and the inevitable (hilarious) backlash


A member of Congress since January 2003, Nunes is perhaps best known nationally first for his involvement in the Benghazi investigation and second for his dogged defense of Donald Trump, upon whose transition team Nunes served. It was Nunes, for example, who wrote the 2018 memo on wiretapping that many Trump supporters believed would permanently damage special counsel Robert Mueller's investigation into Trump's 2016 campaign. (It didn't.)

So it stands to reason that Twitter users less enthralled with Trump would tweet things about Nunes that were perhaps less than cordial — like calling him a “presidential fluffer and swamp rat,” for instance. (In fact, a tweet using those very words was included in the lawsuit.)

EXHIBIT THIRTEEN

Internet URL: <https://vimeo.com/335290980>

Watch Stock size



Robert David Steele Exposed: Wants thousands of law suits to take down social media. With the right attorney...Steven Biss?

5 days ago More

TSV [+ Follow](#)

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This video was published July 9, 2018. Based on Robert David Steele's statements in this video, it's chilling to see what has come to pass. Steele's attorney, Steven Biss started with a frivolous lawsuit (2017) to silence internet journalists who were exposing his #UNRIG Iranian influence campaign and his charity fraud. And by April of 2019 Biss has filed multi-million dollar suits against TWITTER and others on social media. Was RDS privy to a long term plan by his attorney to sue for millions of dollars and take down social media platforms. It sure sounds like it, and it started with his lawsuit in Fall of 2017. Is there a conspiracy to 'silence' researchers and social media participants with federal lawsuits. Here are some of the statements made by Steele.

21:19 -21:
Lawsuit against these guys and I won't talk about lawsuits other than to say that guys like you should be suing

Related Videos

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- Robert David Ste... TSV
- Cora Novoa *Stal... Alex Gargot
- Robert David Ste... TSV
- #1 Wrongful Termination Lawyer - 100% Free Consultation

This video was published July 9, 2018. Based on Robert David Steele's statements in this video, it's chilling to see what has come to pass. Steele's attorney, Steven Biss started with a frivolous lawsuit (2017) to silence internet journalists who were exposing his #UNRIG Iranian influence campaign and his charity fraud. And by April of 2019 Biss has filed multi-million dollar suits against TWITTER and others on social media. Was RDS privy to a long term plan by his attorney to sue for millions of dollars and take down social media

platforms. It sure sounds like it, and it started with his lawsuit in Fall of 2017. Is there a conspiracy to 'silence' researchers and social media participants with federal lawsuits. Here are some of the statements made by Steele:

21:19 -21:

Lawsuit against these guys and I won't talk about lawsuits other than to say that guys like you should be suing the crap out of YouTube

And I'm talking millions of dollars

22:42

YouTube and win from a jury triple damages

22: 58 I have learned to respect the federal judicial system when you have the right lawyer you can in fact get justice within the federal justice system

25:40

You have great case, in my humble opinion you will win millions of dollars from YouTube

26:00

that's very intelligent observation because the legal system is rigged...

28:50

So what I am saying to you is I think that we are now past the point where a judge can rig the system

We are going to take down Youtube and Google and Facebook and Twitter and Amazon and Wikipedia and Meetup and then they are all going to pay millions and millions and millions of dollars because I am going to personally do my very best to inspire with a legal summit ten thousand lawsuits...

EXHIBIT FOURTEEN

Case 1:17-cv-02330-RC Document 60 Filed 05/02/19 Page 1 of 1

United States Court of Appeals
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 18-7156

September Term, 2018

1:17-cv-02330-RC

Filed On: May 2, 2019 [1785641]

George Webb Sweigert,

Appellant

John Does, 1 to 435, to be named later,
individually, and on behalf of all those
similarly situated and Jane Does, 1 to 435,
to be named later, individually, and on
behalf of all those similarly situated,

Appellees

v.

John D. Podesta, Chairman, Hillary for
America, et al.,

Appellees

ORDER

Upon consideration of the motions for summary affirmance; and the court's order to show cause filed December 18, 2018, the response thereto, and the replies, it is

ORDERED that the order to show cause be discharged. It is

FURTHER ORDERED that the motions for summary affirmance be granted, and on the court's own motion, that the district court's September 20, 2018 order be affirmed as to the remaining appellees. The merits of the parties' positions are so clear as to warrant summary action. See *Taxpayers Watchdog, Inc. v. Stanley*, 819 F.2d 294, 297 (D.C. Cir. 1987) (per curiam). The district court correctly granted the motions to dismiss for lack of jurisdiction and denied as moot appellant's motions for other relief. Appellant failed to state a plausible claim that he suffered an injury in fact that was "fairly traceable to the actions of" appellees. *Humane Soc'y of the U.S. v. Vilsack*, 797 F.3d 4, 8 (D.C. Cir. 2015).

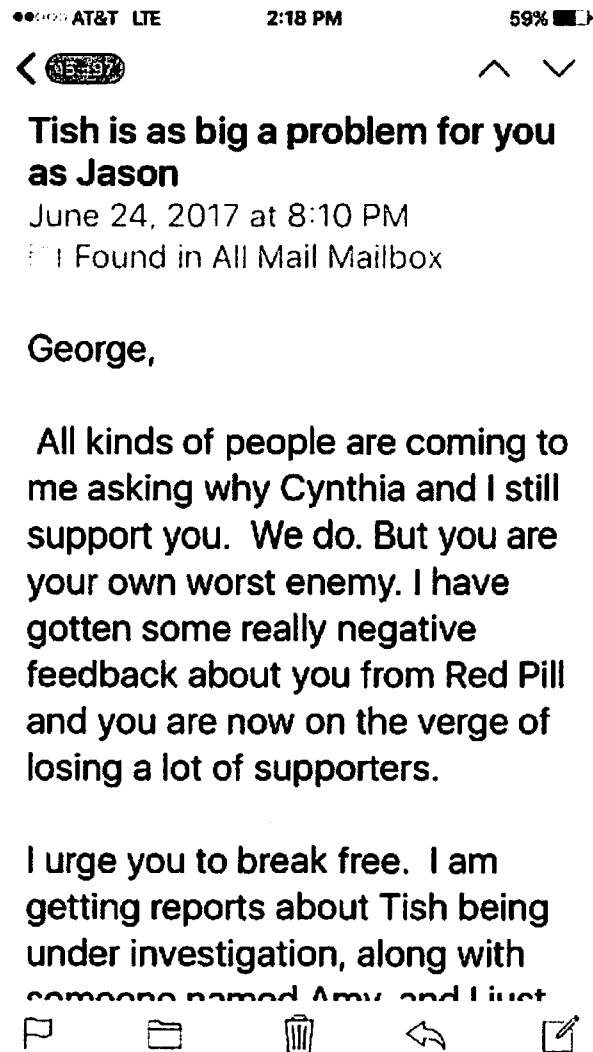
Pursuant to D.C. Circuit Rule 36, this disposition will not be published. The Clerk is directed to withhold issuance of the mandate herein until seven days after resolution of any timely petition for rehearing or petition for rehearing en banc. See Fed. R. App. P. 41(b); D.C. Cir. Rule 41.

Per Curiam

EXHIBIT FIFTEEN

Internet URL:

<https://medium.com/@thehudsonreport/robert-david-steele-george-webb-iran-and-the-port-of-charleston-6be56cbaf9a2>



AT&T LTE 2:14 PM 60%
< [REDACTED] ^ v

From: Robert Steele

To: George Webb

Hide



my last communication - save yourself

June 29, 2017 at 10:06 PM

Found in All Mail Mailbox

George,

I am so very sorry to see you continue as Jason's bitch. This is my last communication. If you do not publicly announce your renunciation of him, and find a new channel, I am cutting you off and including you as a co-conspirator with him.



AT&T LTE 2:16 PM 59%
< 05:28 >

From: Robert Steele

To: Jason Goodman

Hide



Cc: George Webb

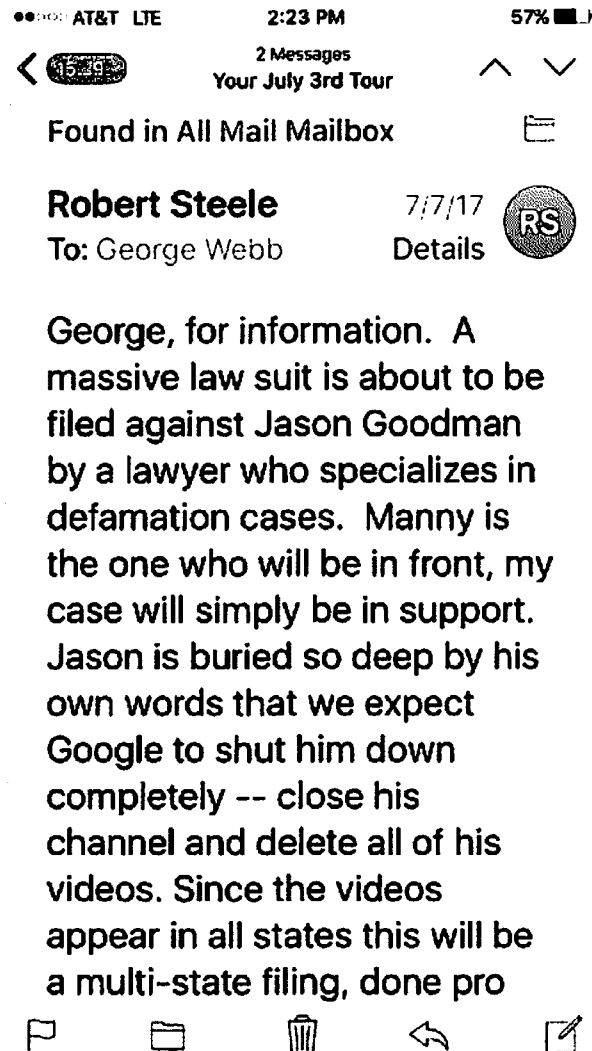
Reinstating lawsuit

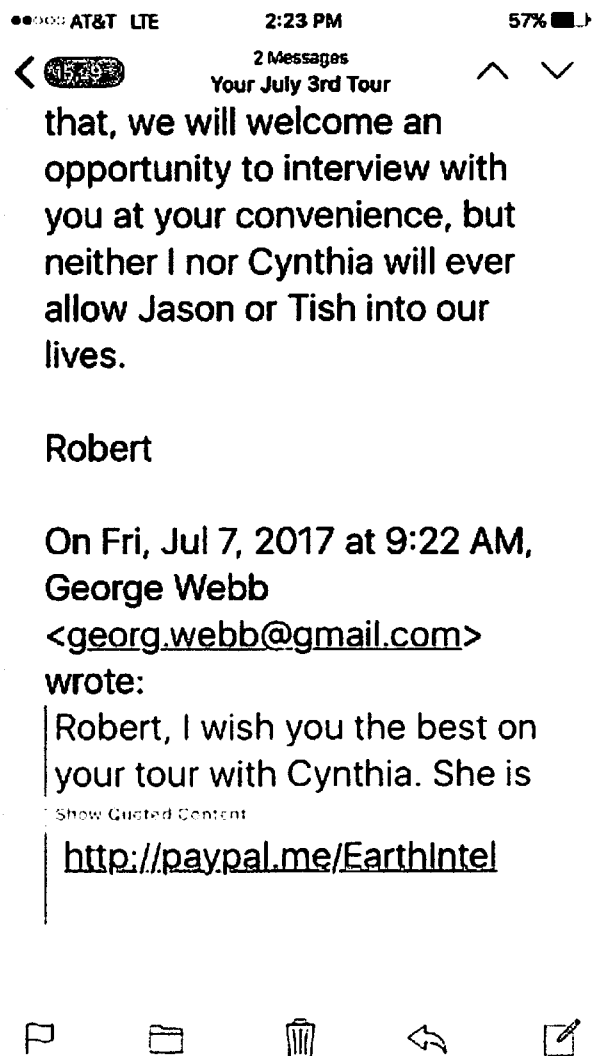
June 26, 2017 at 5:24 PM

Found in All Mail Mailbox

Mr. Goodman, you appear to be seriously stupid. I am reinstating my lawsuit against you. Below is in direct violation of what I thought was our agreement. Dated today, it persuades me that I must file a restraining order against you and also file a civil law suit against you for slander and tortuous interference. You







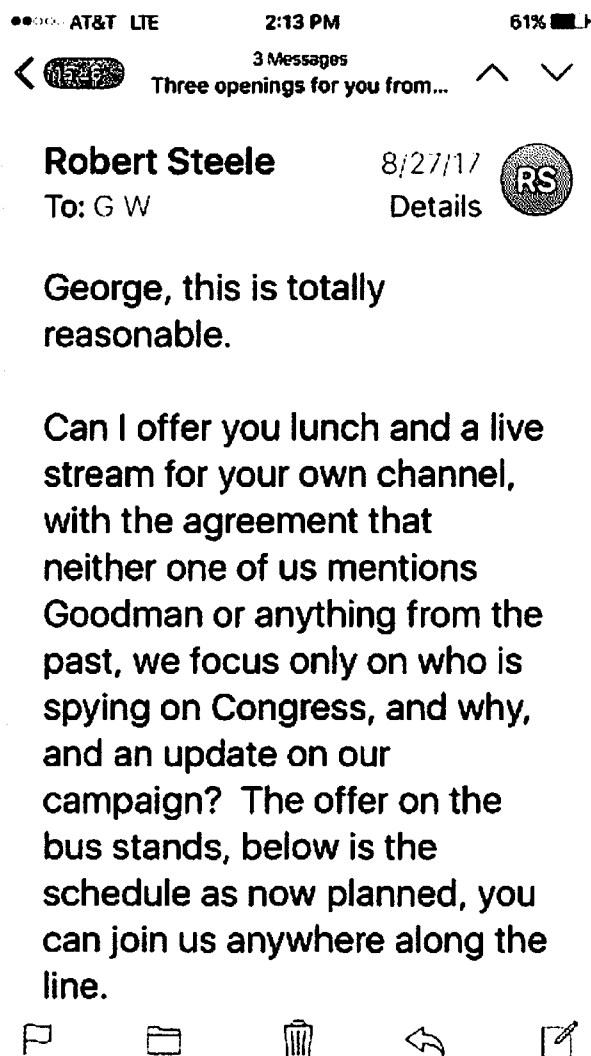





EXHIBIT SIXTEEN**Google search for Robert David Steele for previous week**

robert david steele 

All Videos News Images Shopping More Settings Tools

Past week ▾ All results ▾ Clear

RIAC :: Robert David Steele's blog
<https://russiancouncil.ru/en/blogs/SteelesBlog-en/> ▾
 3 days ago - Robert David Steele's blog: Robert David STEELE Blog of former CIA spy who is also the founder of the Marine Corps Intelligence Activity, the leader of the ...

Public Intelligence Blog – The truth at any cost lowers all other costs
<https://phibetazeta.net/> ▾
 14 hours ago - Robert Steele: Memorandum for the President – Warning on a Violent American Spring. Eight Actions for Donald Trump to Make America Great Again UPDATE ...
 About · Blog · Reviews · Books

Robert Steele: Counterintelligence Failure by CIA & NSA in Venezuela ...
<https://www.veteranstoday.com/> · Government ▾
 5 days ago - Robert David Steele - May 10, 2019 0 7 Counterintelligence Failure by CIA and NSA in Venezuela: An Opportunity for President Donald Trump to Reform US ...

Robert David Steele: Shocking on What Trump Is About to Do | Prophecy
<https://beforeitsnews.com/v3/prophecy/2019/2505566.html> ▾
 3 days ago - Robert David Steele is the conceptualizer of integrated election reform (iUNIRIG) and the integration of holistic analytics, true cost economics, and Open Source ...

Robert David Steele: Shocking on What Trump is about to do ~ Intel
<https://inteldinarchives.blogspot.com/.../robert-david-steele-shocking-on-what.html> ▾
 3 days ago - About minute 2:00 RDS: the Federal Reserve is not Federal and it is not a reserve.....its a criminal organization and it is bankrupt! We have a economic crises ...

Robert David Steele SHOCKING on what TRUMP Is About To Do ...
<https://a-uv.com/robert-david-steele-shocking-on-what-trump-is-about-to-do-interview/> ▾
 3 days ago - Robert David Steele SHOCKING on what TRUMP Is About To Do INTERVIEW. by BZ QAM Riger / Sunday, 12 May 2019 / Published in Disclosure. Robert David ...

Videos




		
Robert David Steele Warning(May 14th,2019)-Global Economic ... Global Financial Apocalypse	Bitcoin Coffee Break - a quick look at the markets World Crypto Network	Board of Commissioners Special Meeting May 14, 2019 Buncombe County

EXHIBIT SEVENTEEN

Internet URL: <https://www.youtube.com/watch?v=Ro4fwV3iCmo&t=4s>



December 21st, 2017 Theresa Grafenstine, House IG Responds.



George Webb

✓ Subscribed 56K

6,738 views

+ Add to Share ... More

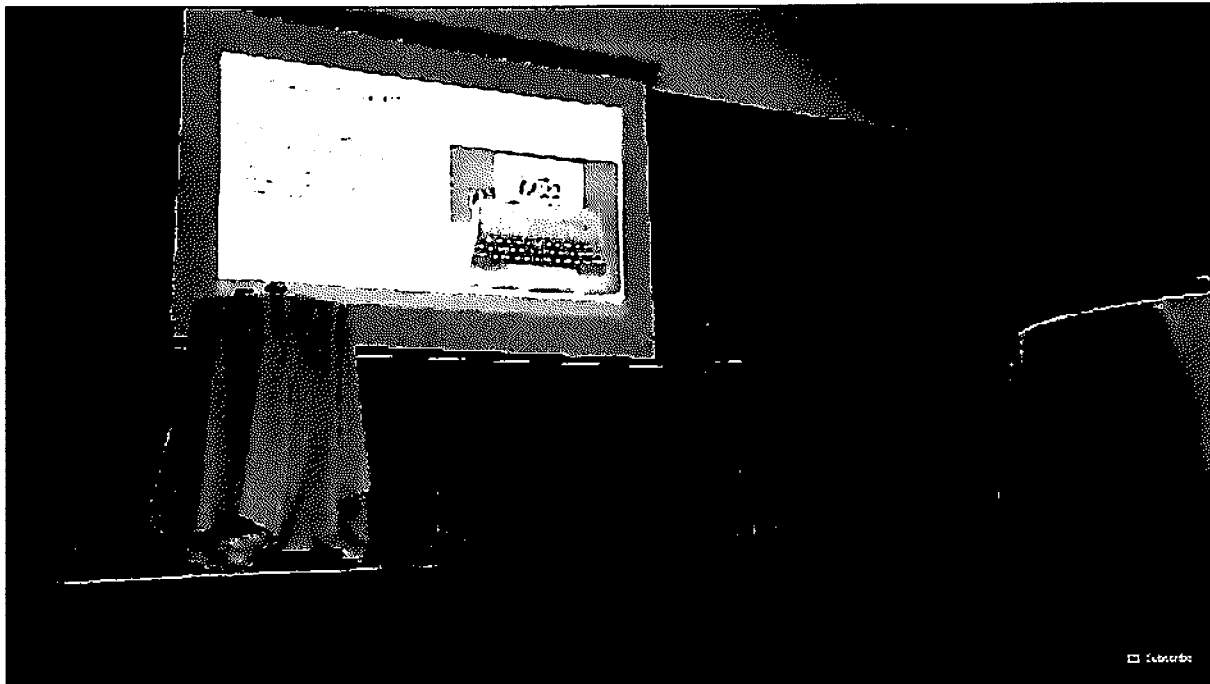
397 16

Published on Dec 21, 2017

Category News & Politics

Published on Dec 21, 2017

Internet URL: <https://www.youtube.com/watch?v=rRhKT3U58Sc>



A Question for Theresa Grafenstine





Jason Goodman

✓ Subscribed  81K

+ Add to  Share ... More

13,330 views

 436  26

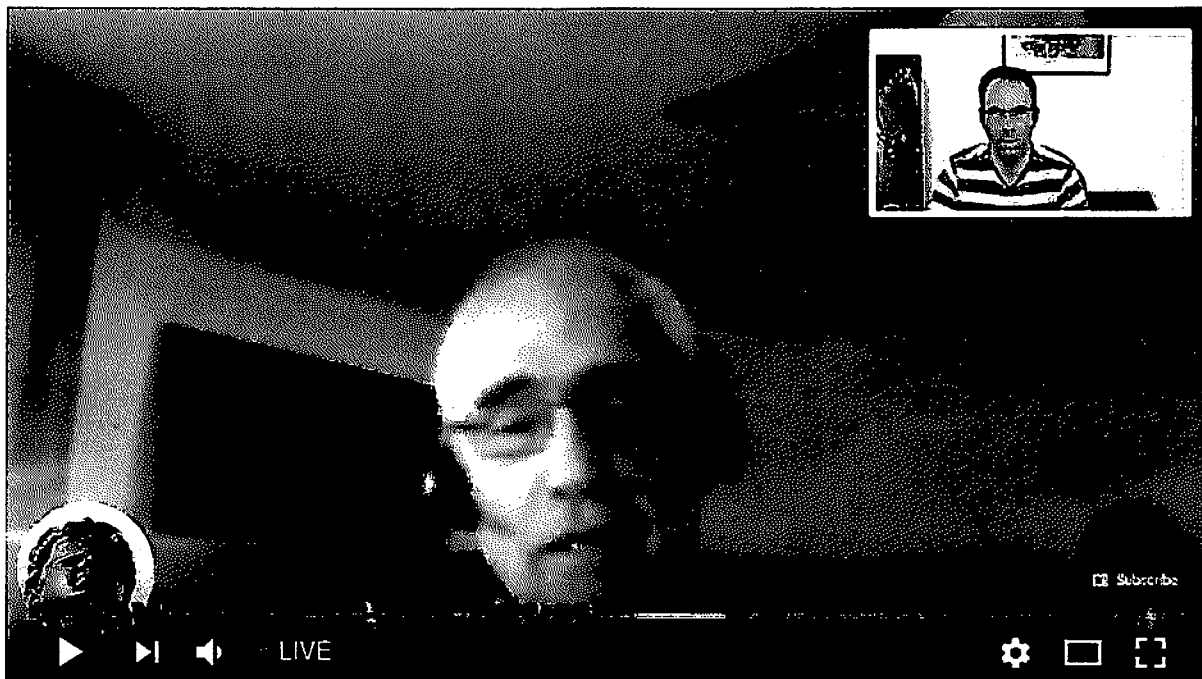
Streamed live on Oct 20, 2017

Become a sponsor of Crowdsorce the Truth and support the effort

EXHIBIT EIGHTEEN

Internet URL:

<https://www.youtube.com/watch?v=HFr09G5Wc1I>



Special Preview of MOORE / PAINE with True Pundit's Mike Moore



Jason Goodman

✓ Subscribed 81K

196 watching now

+ Add to Share Report ... More

33 2

Started streaming 30 minutes ago

Category Entertainment



Special Preview of MOORE / PAINE with True Pundit's Mike Moore



Jason Goodman

✓ Subscribed

81K

201 watching now

+ Add to Share Report ... More

36 2



Special Preview of MOORE / PAINE with True Pundit's Mike Moore



Jason Goodman

✓ Subscribed

81K

200 watching now

+ Add to Share Report ... More

42 4

EXHIBIT NINETEEN

THE FOLLOWING AFFADAVITT is provided under the penalties of perjury. Sometime in early to middle May 2018 the undersigned was contacted via Twitter direct message by the personage known as “Queen Tut” who operated an account “INTJ Fraud”. Queen Tut was a stage name of Susan Holmes/Susan A. Lutzke. In these communications Ms. Holmes warned me that I was the targeted individual of a social media meme campaign designed to discover my whereabouts for the purposes of third parties causing great bodily injury or death.

Ms. Holmes impressed upon me that it was imperative that immediate action be taken to neutralize the meme “STOP THE SACRIFICE” of June 14, 2018 (the one-year anniversary of the Port of Charleston dirty bomb hoax).

I took the information of Ms. Holmes (Queen Tut) very seriously and immediately began posting a series of declarations to the federal court serving the Eastern District of Virginia in the lawsuit Robert David Steele v. Jason Goodman. See ECF. Nos 51, 54, 55, 56, 58, 59 & 60.

During time the undersigned watched YouTube videos with Jason Goodman speaking with Quinn Michaels (aka Korey Atkin) illegally camping in the Mount Shasta, California vicinity.

The undersigned has substantial contacts in this community and relies on this area as a vacation residence and a conducive environment to pursue spiritual practices. Quinn distributed at least a dozen video podcasts on his personal YouTube channel advising the public that a satanic cult was planning a child sacrifice on June 14, 2018 and that the undersigned was coordinating and protecting the individuals involved. At one-point Quinn began interviewing people that knew the undersigned.

This included a homeless wildland fire-fighter named "Kyle" who the undersigned had befriended a year earlier. The undersigned provided "Kyle" a field pack, \$100 cash, a pre-paid disposable phone and several personal items. This act is merely a reflection of the brotherhood of veterans watching out for each other (as "Kyle" was a U.S. Marine Corp veteran that served in Iraq).

The undersigned states that during this time the business owners of the postal service box (originally listed on my declarations in the Steele v. Goodman court case) reported that a man with one eye-brow was visiting the postal counter and inquiring who owned the box in Greenbrae, Calif. 94904. Quinn Michaels produced at least two dozen videos where he appears with one eye brow.

I was further advised by Susan Holmes that Mr. Goodman had a peculiar interest in dating young women in the age ranges of 18 – 19 years old. Overhearing discussions about having sexual relations with 18 – 19 years olds between Def Goodman and George Webb Sweigert led to her disgust of the entire Crowdsourcing The Truth notion (according to her).

Further, Susan Holmes advised me that Def Goodman had sponsored several work VISAs for foreigners from the area of Serbia. She said that she had calculated that between 5 – 6 foreigners went to work for "21st Century 3D" from Serbia.

I hereby attest that the foregoing statement is true. Sworn this 15 day of May, 2019.



D. George Sweigert, c/o
P.O. Box 152
Mesa, AZ 85221

Spoliation-notice@mailbox.org

END

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ROBERT DAVID STEELE,

Plaintiff,

-against-

JASON GOODMAN,

Defendant.

17-CV-00601-MHL

**LOCAL RULE 83.1(M)
CERTIFICATION**

**LOCAL RULE 83.1(M) CERTIFICATION
WITH CERTIFICATE OF SERVICE**

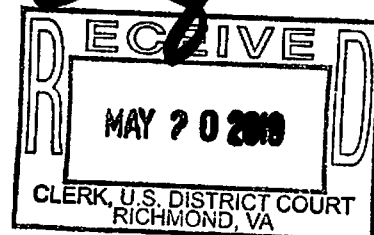
1. **GHOST WRITING CERTIFICATION.** I (the undersigned) declare under penalty of perjury that: NO ATTORNEY HAS PREPARED, OR ASSISTED IN THE PREPARTION OF THE ANSWER TO PLAINTIFF STEELE'S MEMORANDUM OF OPPOSITION.

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 15 day of May, 2019.

Pro Se D. George Sweigert

**D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211
Spoliation-notice@mailbox.org**

D. Sweigert



It is hereby certified that the accompanying materials have been placed in the U.S. Postal Service with First Class mail postage affixed and addressed to the following parties:

**Clerk of the Court
U.S. District Court
701 E. Broad St.
Richmond, VA 23219**

**Jason Goodman
252 7th Avenue
Suite 6-S
New York, NY 10001**

**Susan Homes,
aka Susan A. Lutzke
2608 Leisure Drive
Apt. B
Fort Collins, CO 80525**

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 15

day of May, 2019.

A handwritten signature in black ink, appearing to read "D. Sweigert", is written over a horizontal line.

**D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211**